

EXHIBIT 1

(Stipulating Parties Listed on Signature Pages)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 07-5944 SC
MDL No. 1917

This Document Relates to:

Dell Inc., et al. v. Hitachi, Ltd., et al., Case
No. 13-cv-02171-SC

*Sharp Electronics Corp., et al. v. Hitachi
Ltd., et al.*, Case No. 13-cv-1173-SC

*Sharp Electronics Corp., et al. v.
Koninklijke Philips Electronics N.V., et al.*,
Case No. 13-cv-2776-SC

*Tech Data Corporation, et al. v. Hitachi,
Ltd., et al.*, Case No. 13-cv-00157-SC

**STIPULATION AND ~~[PROPOSED]~~
ORDER SETTING SCHEDULE FOR
DEFENDANTS TO ANSWER OR
OTHERWISE RESPOND TO THE
DELL AMENDED COMPLAINT,
SHARP COMPLAINT, AND TECH
DATA AMENDED COMPLAINT**

STIPULATION AND [PROPOSED] ORDER SETTING SCHEDULE FOR DEFENDANTS
TO ANSWER OR OTHERWISE RESPOND TO THE DELL AMENDED COMPLAINT,
SHARP COMPLAINT, AND TECH DATA AMENDED COMPLAINT

Case No. 07-5944 SC; MDL No. 1917

1 Pursuant to Civil Local Rules 6-2 and 7-12, the undersigned Defendants and Plaintiffs
2 Dell Inc. and Dell Products L.P. (“Dell”), Sharp Electronics Corporation and Sharp
3 Electronics Manufacturing Company of America, Inc. (“Sharp”), and Tech Data Corporation
4 and Tech Data Product Management, Inc. (“Tech Data”) (collectively, the “Stipulating
5 Plaintiffs”) have conferred by and through their counsel and, subject to the Court’s approval,
6 HEREBY STIPULATE AS FOLLOWS:

7 WHEREAS, there is pending in the United States District Court for the Northern
8 District of California a multidistrict consolidated proceeding comprised of actions brought on
9 behalf of purported purchasers of cathode ray tubes (“CRT”) and CRT products, captioned as
10 *In re: Cathode Ray Tube (CRT) Antitrust Litigation*, Case No. 3:07-cv-05944 SC (MDL No.
11 1917) (the “MDL Proceedings”);

12 WHEREAS, on August 17, 2012, Defendants filed motions to dismiss and for
13 judgment on the pleadings with respect to certain Direct Action Plaintiff complaints (the
14 “Dispositive Motions”) (MDL Dkt. Nos. 1316, 1317, 1319);

15 WHEREAS, on December 11, 2012, Tech Data filed a Summons and Complaint in
16 the Middle District of Florida, *Tech Data Corporation, et al. v. Hitachi, Ltd. et al.*, Case No.
17 8:12-cv-02795-JSM-MAP (the “Tech Data Action”);

18 WHEREAS, on January 4, 2013, the United States Judicial Panel on Multidistrict
19 Litigation transferred the Tech Data Complaint to the United States District Court for the
20 Northern District of California for consolidated pretrial proceedings and assigned it to the
21 Honorable Samuel Conti (MDL Dkt. No. 1518);

22 WHEREAS, on February 13, 2013, Tech Data filed a Stipulation and Proposed Order
23 Regarding the Complaint in the Tech Data Action (MDL Dkt. No. 1568) requesting the Court
24 to enter an order authorizing the Defendants and Tech Data, once the Court has ruled on the
25 Dispositive Motions, to set a reasonable deadline for Defendants’ answers and/or a
26 reasonable briefing schedule for Defendants’ motions to dismiss Tech Data’s Complaint;

27
28
STIPULATION AND [PROPOSED] ORDER SETTING SCHEDULE FOR DEFENDANTS
TO ANSWER OR OTHERWISE RESPOND TO THE DELL AMENDED COMPLAINT,
SHARP COMPLAINT, AND TECH DATA AMENDED COMPLAINT
Case No. 07-5944 SC; MDL No. 1917

1 WHEREAS, on February 14, 2013, Special Master Legge signed the Proposed Order
2 pursuant to the Stipulation Regarding the Complaint in the Tech Data Action (MDL Dkt.
3 1570);

4 WHEREAS, on September 9, 2013, Tech Data filed its First Amended Complaint
5 (MDL Dkt. No. 1911);

6 WHEREAS, on September 18, 2013, the Court entered an Order pursuant to the
7 Stipulation Regarding the Complaint in the Tech Data Action;

8 WHEREAS, on February 17, 2013, Dell filed a Summons and Complaint in the
9 Western District of Texas, *Dell Inc., et al., v. Philips Electronics North America Corp., et al.*,
10 Case No. 13-cv-00141 (the “Dell Action”);

11 WHEREAS, on March 15, 2013, Sharp filed a Summons and Complaint in the
12 Northern District of California, *Sharp Electronics Corp., et al. v. Hitachi, Ltd., et. al.*, Case
13 No. 13-cv-1173;

14 WHEREAS, on March 19, 2013, the Judicial Panel on Multidistrict Litigation issued
15 a conditional transfer order pursuant to 28 U.S.C. § 1407, transferring the Dell Action to the
16 Northern District of California to be consolidated with the MDL Proceedings (MDL Dkt. No.
17 1620);

18 WHEREAS, on March 26, 2013, this Court entered an Order finding that *Sharp*
19 *Electronics Corp., et al. v. Hitachi, Ltd., et al.* is related to the MDL Proceedings (MDL Dkt.
20 No. 1608);

21 WHEREAS, on April 23, 2013, Sharp filed a Stipulation and Proposed Order
22 Regarding the Complaint in the Sharp Action (MDL Dkt. 1649) requesting the Court to enter
23 an order authorizing the Defendants and Sharp, once the Court has ruled on the Dispositive
24 Motions, to set a reasonable deadline for Defendants’ answers and/or a reasonable briefing
25 schedule for Defendants’ motions to dismiss Sharp’s Complaint;

26 WHEREAS, on April 24, 2013, the Court entered an Order pursuant to the Stipulation
27 Regarding the Complaint in the Sharp Action (MDL Dkt. No. 1652);

28 WHEREAS, on May 13, 2013, the Dell Action was transferred to the MDL;

STIPULATION AND [PROPOSED] ORDER SETTING SCHEDULE FOR DEFENDANTS
TO ANSWER OR OTHERWISE RESPOND TO THE DELL AMENDED COMPLAINT,
SHARP COMPLAINT, AND TECH DATA AMENDED COMPLAINT

Case No. 07-5944 SC; MDL No. 1917

1 WHEREAS, on May 28, 2013, Dell filed its First Amended Complaint (MDL Dkt.
2 No. 1726);

3 WHEREAS, on June 17, 2013, Dell filed a Stipulation and Proposed Order Regarding
4 the First Amended Complaint in the Dell Action (MDL Dkt. No. 1739) requesting the Court
5 to enter an order authorizing the Defendants and Dell, once the Court has ruled on the
6 Dispositive Motions, to set a reasonable deadline for Defendants' answers and/or a
7 reasonable briefing schedule for Defendants' motions to dismiss Dell's Complaint;

8 WHEREAS, on June 17, 2013, Sharp filed a Summons and Complaint in the
9 Northern District of California, *Sharp Electronics Corp., et al. v. Koninklijke Philips*
10 *Electronics N.V., et al.*, Case No. 13-cv-2776 (together collectively with Sharp's Complaint
11 dated March 15, 2013, the "Sharp Action");

12 WHEREAS, on June 21, 2013, this Court entered an Order finding that *Sharp*
13 *Electronics Corp., et al. v. Koninklijke Philips Electronics N.V., et al.* is related to the MDL
14 Proceedings (MDL Dkt. No. 1745);

15 WHEREAS, on June 28, 2013, Sharp filed a Stipulation and Proposed Order
16 Regarding the Complaint in the Sharp Action (MDL Dkt. 1748) requesting the Court to enter
17 an order authorizing the Defendants Koninklijke Philips Electronics N.V. and Philips
18 Electronics North America Corporation and Sharp, once the Court has ruled on the
19 Dispositive Motions, to set a reasonable deadline for defendants' answers and/or a reasonable
20 briefing schedule for defendants' motions to dismiss Sharp's Complaint;

21 WHEREAS, on July 3, 2013, the Court entered an Order pursuant to the Stipulation
22 Regarding the Complaint in the Sharp Action and Defendants Koninklijke Philips Electronics
23 N.V. and Philips Electronics North America Corporation (MDL Dkt. No. 1762);

24 WHEREAS, on July 3, 2013, the Court entered an Order pursuant to the Stipulation
25 Regarding the First Amended Complaint in the Dell Action (MDL Dkt. No. 1763);

26 WHEREAS, on August 21, 2013, the Court issued an Order Adopting in Part and
27 Modifying in Part Special Master's Report and Recommendation on Defendants' Motion to
28

STIPULATION AND [PROPOSED] ORDER SETTING SCHEDULE FOR DEFENDANTS
TO ANSWER OR OTHERWISE RESPOND TO THE DELL AMENDED COMPLAINT,
SHARP COMPLAINT, AND TECH DATA AMENDED COMPLAINT

Case No. 07-5944 SC; MDL No. 1917

1 Dismiss the Direct Action Plaintiffs' Complaints ("August 21, 2013 Order") (MDL Dkt.
2 1856) in which the Court ruled on the Dispositive Motions;

3 WHEREAS, among other issues, the August 21, 2013 Order granted the Dispositive
4 Motions to the extent that they challenged certain Direct Action Plaintiffs' alleged right to
5 proceed under the "cost-plus" and "co-conspirator" exceptions to *Illinois Brick Co. v.*
6 *Illinois*, 431 U.S. 720 (1977) ("*Illinois Brick*"), and denied the Dispositive Motions to the
7 extent that they challenged certain Direct Action Plaintiffs' right to proceed under the
8 "ownership or control" exception to *Illinois Brick*; and

9 WHEREAS, the Defendants seek to dismiss the Stipulating Plaintiffs' Complaints
10 relying upon the same *Illinois Brick* arguments they used in the Dispositive Motions; and

11 WHEREAS, the Stipulating Plaintiffs and the Defendants seek to resolve the
12 Defendants' *Illinois Brick* arguments in a manner that conserves the resources of the Court
13 while at the same time preserving any and all appeal rights of both the Stipulating Plaintiffs
14 and the Defendants;

15 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED between
16 counsel for the Stipulating Plaintiffs and counsel for the undersigned Defendants in the
17 above-captioned actions, as follows:

- 18 1. The Defendants' answers to (or motions to dismiss) the Stipulating Plaintiffs'
19 Complaints shall be due by October 7, 2013;
- 20 2. The Stipulating Plaintiffs' responses to any motions to dismiss shall be due by
21 November 6, 2013;
- 22 3. The Defendants' reply briefs shall be due by November 20, 2013;
- 23 4. The Stipulating Plaintiffs and Defendants agree that the issues addressed by
24 the Court's August 21, 2013 Order regarding the *Illinois Brick* exceptions
25 apply to the Stipulating Plaintiffs' actions;
- 26 5. The Stipulating Plaintiffs' Complaints do not seek to proceed under the "cost-
27 plus" and "co-conspirator" exceptions to *Illinois Brick*;
- 28

STIPULATION AND [PROPOSED] ORDER SETTING SCHEDULE FOR DEFENDANTS
TO ANSWER OR OTHERWISE RESPOND TO THE DELL AMENDED COMPLAINT,
SHARP COMPLAINT, AND TECH DATA AMENDED COMPLAINT

Case No. 07-5944 SC; MDL No. 1917

- 1 6. The undersigned Defendants' request to dismiss the Stipulating Plaintiffs'
2 Complaints as they pertain to the Stipulating Plaintiffs' right to proceed under
3 the "ownership or control" exception to *Illinois Brick* is denied for the reasons
4 set forth in the August 21, 2013 Order; and
5 7. By virtue of this Stipulation, the undersigned Defendants and the Stipulating
6 Plaintiffs do not waive any of their appeal rights to the *Illinois Brick* issues
7 addressed and resolved in this Stipulation.
8

9 Dated: October 1, 2013

Respectfully submitted,

WHITE & CASE LLP

By: /s/ Lucius B. Lau
CHRISTOPHER M. CURRAN (*pro hac vice*)
ccurran@whitecase.com
LUCIUS B. LAU (*pro hac vice*)
alau@whitecase.com
DANA E. FOSTER (*pro hac vice*)
defoster@whitecase.com

WHITE & CASE LLP

701 Thirteenth Street, N.W.
Washington, DC 20005
Telephone: (202) 626-3600
Facsimile: (202) 639-9355

*Attorneys for Defendants Toshiba Corporation,
Toshiba America, Inc., Toshiba America
Information Systems, Inc., Toshiba America
Consumer Products, L.L.C., and Toshiba America
Electronic Components, Inc.*

23
24
25
26
27
28

STIPULATION AND [PROPOSED] ORDER SETTING SCHEDULE FOR DEFENDANTS
TO ANSWER OR OTHERWISE RESPOND TO THE DELL AMENDED COMPLAINT,
SHARP COMPLAINT, AND TECH DATA AMENDED COMPLAINT

Case No. 07-5944 SC; MDL No. 1917

White & Case LLP
701 Thirteenth Street, NW
Washington, DC 20005

WINSTON & STRAWN LLP

By: /s/ Jeffrey L. Kessler

JEFFREY L. KESSLER (*pro hac vice*)

JKessler@winston.com

A. PAUL VICTOR (*pro hac vice*)

PVictor@winston.com

ALDO A. BADINI (SBN 257086)

ABadini@winston.com

EVA W. COLE (*pro hac vice*)

EWCole@winston.com

MOLLY M. DONOVAN

MMDonovan@winston.com

WINSTON & STRAWN LLP

200 Park Avenue

New York, NY 10166

Telephone: (212) 294-6700

Facsimile: (212) 294-4700

STEVEN A. REISS (*pro hac vice*)

steven.reiss@weil.com

DAVID L. YOHAI (*pro hac vice*)

david.yohai@weil.com

ADAM C. HEMLOCK (*pro hac vice*)

adam.hemlock@weil.com

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153-0119

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

*Attorneys for Defendants Panasonic Corporation
(f/k/a Matsushita Electric Industrial Co., Ltd.),
Panasonic Corporation of North America, MT
Picture Display Co., Ltd.*

STIPULATION AND [PROPOSED] ORDER SETTING SCHEDULE FOR DEFENDANTS
TO ANSWER OR OTHERWISE RESPOND TO THE DELL AMENDED COMPLAINT,
SHARP COMPLAINT, AND TECH DATA AMENDED COMPLAINT

Case No. 07-5944 SC; MDL No. 1917

White & Case LLP
701 Thirteenth Street, NW
Washington, DC 20005

KIRKLAND & ELLIS LLP

By: /s/ Eliot A. Adelson

ELIOT A. ADELSON (SBN 205284)
JAMES MAXWELL COOPER (SBN 284054)

KIRKLAND & ELLIS LLP

555 California Street, 27th Floor
San Francisco, California 94104

Tel: (415) 439-1400

Facsimile: (415) 439-1500

E-mail: eadelson@kirkland.com

E-mail: max.cooper@kirkland.com

JAMES H. MUTCHNIK, P.C. (*pro hac vice*)

KATE WHEATON (*pro hac vice*)

KIRKLAND & ELLIS LLP

300 North LaSalle

Chicago, Illinois 60654

Tel: (312) 862-2000

Facsimile: (312) 862-2200

Attorneys for Defendants Hitachi, Ltd., Hitachi Displays, Ltd. (n/k/a Japan Display East, Inc.), Hitachi Asia, Ltd., Hitachi America, Ltd., and Hitachi Electronic Devices (USA), Inc.

MUNGER, TOLLES & OLSON LLP

By: /s/ Hojoon Hwang

HOJOON HWANG (SBN 184950)

Hojoon.Hwang@mto.com

MUNGER, TOLLES & OLSON LLP

560 Mission Street, Twenty-Seventh Floor

San Francisco, California 94105-2907

Telephone: (415) 512-4000

Facsimile: (415) 512-4077

STIPULATION AND [PROPOSED] ORDER SETTING SCHEDULE FOR DEFENDANTS
TO ANSWER OR OTHERWISE RESPOND TO THE DELL AMENDED COMPLAINT,
SHARP COMPLAINT, AND TECH DATA AMENDED COMPLAINT

Case No. 07-5944 SC; MDL No. 1917

1 WILLIAM D. TEMKO (SBN 098858)
2 William.Temko@mto.com
3 JONATHAN E. ALTMAN (SBN 170607)
4 Jonathan.Altman@mto.com
5 BETHANY W. KRISTOVICH (SBN 241891)
6 Bethany.Kristovich@mto.com

7 **MUNGER, TOLLES & OLSON LLP**
8 355 South Grand Avenue, Thirty-Fifth Floor
9 Los Angeles, CA 90071-1560
10 Telephone: (213) 683-9100
11 Facsimile: (213) 687-3702

12 *Attorneys for Defendants LG Electronics, Inc.; LG,*
13 *LG Electronics USA, Inc.; and LG Electronics*
14 *Taiwan Taipei Co., Ltd.*

15 SHEPPARD MULLIN RICHTER & HAMPTON

16 By: /s/ Gary L. Halling
17 GARY L. HALLING (SBN 66087)
18 ghalling@sheppardmullin.com
19 JAMES L. MCGINNIS (SBN 95788)
20 jmcginnis@sheppardmullin.com
21 MICHAEL W. SCARBOROUGH (SBN 203524)
22 mscarborough@sheppardmullin.com

23 **SHEPPARD MULLIN RICHTER & HAMPTON**
24 Four Embarcadero Center, 17th Floor
25 San Francisco, California 94111
26 Telephone: (415) 434-9100
27 Facsimile: (415) 434-3947

28 *Attorneys for Defendants Samsung SDI America,*
Inc.; Samsung SDI Co., Ltd.; Samsung SDI
(Malaysia) SDN. BHD.; Samsung SDI Mexico S.A.
DE C.V.; Samsung SDI Brasil Ltda.; Shenzen

Samsung SDI Co., Ltd. and Tianjin Samsung SDI
Co., Ltd.

STIPULATION AND [PROPOSED] ORDER SETTING SCHEDULE FOR DEFENDANTS
TO ANSWER OR OTHERWISE RESPOND TO THE DELL AMENDED COMPLAINT,
SHARP COMPLAINT, AND TECH DATA AMENDED COMPLAINT

Case No. 07-5944 SC; MDL No. 1917

BAKER BOTTS LLP

By: /s/ Jon V. Swenson

JON V. SWENSON (SBN 233054)

jon.swenson@bakerbotts.com

BAKER BOTTS LLP

1001 Page Mill Road

Building One, Suite 200

Palo Alto, CA 94304

Telephone: (650) 739-7500

Facsimile: (650) 739-7699

E-mail: jon.swenson@bakerbotts.com

JOHN M. TALADAY (*pro hac vice*)

john.taladay@bakerbotts.com

JOSEPH OSTOYICH (*pro hac vice*)

joseph.ostoyich@bakerbotts.com

ERIK T. KOONS (*pro hac vice*)

erik.koons@bakerbotts.com

CHARLES M. MALAISE (*pro hac vice*)

charles.malaise@bakerbotts.com

BAKER BOTTS LLP

1299 Pennsylvania Ave., N.W.

Washington, DC 20004-2400

Telephone: (202) 639-7700

Facsimile: (202) 639-7890

*Attorneys for Defendants Koninklijke Philips N.V. and
Philips Electronics North America Corporation*

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Rachel S. Brass

RACHEL S. BRASS (SBN 219301)

rbrass@gibsondunn.com

JOEL S. SANDERS (SBN 107234)

jsanders@gibsondunn.com

Austin V. Schwing (SBN 211696)

GIBSON, DUNN & CRUTCHER LLP

555 Mission Street, Suite 3000

San Francisco, California 94105

Tel: (415) 393-8200

Fax: (415) 393-8306

*Attorneys for Defendant Chunghwa Picture Tubes,
Ltd. and Chunghwa Picture Tubes (Malaysia) as to
the Tech Data Action only*

STIPULATION AND [PROPOSED] ORDER SETTING SCHEDULE FOR DEFENDANTS
TO ANSWER OR OTHERWISE RESPOND TO THE DELL AMENDED COMPLAINT,
SHARP COMPLAINT, AND TECH DATA AMENDED COMPLAINT

Case No. 07-5944 SC; MDL No. 1917

ALSTON & BIRD

By: /s/ Debra D. Bernstein

DEBRA D. BERNSTEIN (*pro hac vice*)

debra.bernstein@alston.com

MICHAEL P. KENNY (*pro hac vice*)

mike.kenny@alston.com

RODNEY J. GANSKE (*pro hac vice*)

rod.ganske@alston.com

MATTHEW D. KENT (*pro hac vice*)

matthew.kent@alston.com

ELIZABETH JORDAN (*pro hac vice*)

elizabeth.jordan@alston.com

MELISSA WHITEHEAD (*pro hac vice*)

melissa.whitehead@alston.com

ALSTON & BIRD LLP

1201 West Peachtree Street

Atlanta, Georgia 30309-03424

Tel: (404) 881-7000

Facsimile: (404) 881-7777

*Attorneys for Plaintiffs Dell Inc. and Dell Products
L.P.*

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

By: /s/ Craig A. Benson

KENNETH A. GALLO (*pro hac vice*)

JOSEPH J. SIMONS (*pro hac vice*)

CRAIG A. BENSON (*pro hac vice*)

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

2001 K Street, NW

Washington, DC 20006

Tel: (202) 223-7356

Facsimile: (202) 204-7356

Email: kgallo@paulweiss.com

Email: jsimons@paulweiss.com

Email: cbenson@paulweiss.com

*Attorneys for Plaintiffs Sharp Electronics
Corporation and Sharp Electronics Manufacturing
Company of America, Inc.*

STIPULATION AND [PROPOSED] ORDER SETTING SCHEDULE FOR DEFENDANTS
TO ANSWER OR OTHERWISE RESPOND TO THE DELL AMENDED COMPLAINT,
SHARP COMPLAINT, AND TECH DATA AMENDED COMPLAINT

Case No. 07-5944 SC; MDL No. 1917

White & Case LLP
701 Thirteenth Street, NW
Washington, DC 20005

1 BILZIN SUMBERG BAENA PRICE
2 & AXELROD LLP

3 By: /s/ Scott N. Wagner

4 ROBERT W. TURKEN
5 MITCHELL E. WIDOM
6 SCOTT N. WAGNER

7 **BILZIN SUMBERG BAENA PRICE**
8 **& AXELROD LLP**

9 1450 Brickell Ave., Suite 2300
10 Miami, Florida 33131-3456
11 Tel: (305) 374-7580
12 Facsimile: (305) 374-7593
13 E-mail: rturken@bilzin.com
14 E-mail: mwidom@bilzin.com
15 E-mail: swagner@bilzin.com

16 STUART H. SINGER

17 **BOIES, SCHILLER, & FLEXNER LLP**

18 401 East Las Olas Boulevard, Suite 1200
19 Fort Lauderdale, Florida 33301
20 Tel: (954) 356-0011
21 Facsimile: (954) 356-0022
22 E-mail: ssinger@bsflp.com

23 *Attorneys for Plaintiffs Tech Data Corporation and*
24 *Tech Data Product Management, Inc.*

25
26
27
28
STIPULATION AND [PROPOSED] ORDER SETTING SCHEDULE FOR DEFENDANTS
TO ANSWER OR OTHERWISE RESPOND TO THE DELL AMENDED COMPLAINT,
SHARP COMPLAINT, AND TECH DATA AMENDED COMPLAINT

Case No. 07-5944 SC; MDL No. 1917

1 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

2 I, Lucius B. Lau, attest that concurrence in the filing of this document has been
3 obtained from all signatories. I declare under penalty of perjury under the laws of the
4 United States of America that the foregoing is true and correct. Executed this 1st day of
5 October, 2013, at Washington, DC.

6
7
8 By: /s/ Lucius B. Lau
9 Lucius B. Lau

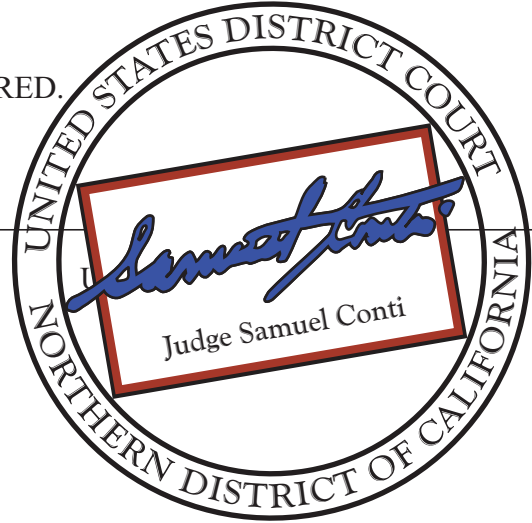
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

STIPULATION AND [PROPOSED] ORDER SETTING SCHEDULE FOR DEFENDANTS
TO ANSWER OR OTHERWISE RESPOND TO THE DELL AMENDED COMPLAINT,
SHARP COMPLAINT, AND TECH DATA AMENDED COMPLAINT

Case No. 07-5944 SC; MDL No. 1917

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 10/01/2013



STIPULATION AND [PROPOSED] ORDER SETTING SCHEDULE FOR DEFENDANTS
TO ANSWER OR OTHERWISE RESPOND TO THE DELL AMENDED COMPLAINT,
SHARP COMPLAINT, AND TECH DATA AMENDED COMPLAINT

Case No. 07-5944 SC; MDL No. 1917

EXHIBIT 2

William A. Isaacson
 Jennifer Milici
 BOIES, SCHILLER & FLEXNER LLP
 5301 Wisconsin Ave. NW, Suite 800
 Washington, D.C. 20015
 Telephone: (202) 237-2727
 Facsimile: (202) 237-6131
 Email: wisaacson@bsfllp.com
 Email: jmilici@bsfllp.com

Philip J. Iovieno
 Anne M. Nardacci
 BOIES, SCHILLER & FLEXNER LLP
 10 North Pearl Street, 4th Floor
 Albany, NY 12207
 Telephone: (518) 434-0600
 Facsimile: (518) 434-0665
 Email: piovieno@bsfllp.com
 Email: anardacci@bsfllp.com

*Liaison Counsel for Direct Action Plaintiffs and
 Attorneys for Plaintiffs Electrograph Systems, Inc.,
 Electrograph Technologies, Corp., Office Depot, Inc.,
 Compucom Systems, Inc., Interbond Corporation of
 America, P.C. Richard & Son Long Island
 Corporation, MARTA Cooperative of America, Inc.,
 ABC Appliance, Inc., Schultze Agency Services LLC
 on behalf of Tweeter Opco, LLC and Tweeter
 Newco, LLC*

[additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

In re: Cathode Ray Tube (CRT)
 ANTITRUST LITIGATION

Master File No. 3:07-md-05944-SC
 MDL No. 1917.

This Document Relates To:

*Electrograph Systems, Inc., et al. v. Hitachi,
 Ltd., et al.*, No. 11-cv-01656;
Stoebner, et al. v. LG Electronics, et al., No.
 11-cv-05381;
Siegel v. Hitachi, Ltd., et al. No. 11-cv-05502;
Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
 No. 11-cv-05513;

**DIRECT ACTION PLAINTIFFS' FIRST
 SET OF REQUESTS FOR PRODUCTION
 TO DEFENDANTS CHUNGHWA
 PICTURE TUBES, LTD. and
 CHUNGHWA PICTURE TUBES
 (MALAYSIA).**

DIRECT ACTION PLAINTIFFS' FIRST SET OF
 REQUESTS FOR PRODUCTION TO CHUNGHWA DEFENDANTS

Master File No. 3:07-md-05944-SC

1 *Target Corp, et al. v. Chunghwa Picture*
Tubes, Ltd., et al., No. 11-cv-05514;
2
3 *Interbond Corporation of America v. Hitachi,*
et al., No. 11-cv-06275;
4
5 *Office Depot, Inc. v. Hitachi Ltd., et al.*,
No. 11-cv-06276;
6
7 *CompuCom Systems, Inc. v. Hitachi, Ltd.,*
et al., No. 11-cv-06396;
8
9 *Costco Wholesale Corporation v. Hitachi, Ltd.,*
et al., No. 11-cv-06397;
10
11 *P.C. Richard & Son Long Island Corporation,*
et al. v. Hitachi, Ltd., et al., No. 12-cv-02648;
12
13 *Schultze Agency Services, LLC, et al. v.*
Hitachi, Ltd., et al., No. 12-cv-02649;
14
15 *Tech Data Corporation, et al. v. Hitachi, Ltd.,*
et al., No. 12-cv-02795-JSM-MAP (M.D.
Fla.).

PROPOUNDING PARTIES:

Direct Action Plaintiffs Electrograph Systems, Inc. and Electrograph Technologies Corp.; John R. Stoeber, as Chapter 7 Trustee for PBE Consumer Electronics, LLC and related entities and Douglas Kelley, as Chapter 11 Trustee for Petters Company, Inc. and related entities, and as Receiver for Petters Company, LLC and related entities; Alfred H. Siegel, solely as Trustee of the Circuit City Stores, Inc. Liquidating Trust; Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., Bestbuy.com, L.L.C., and Magnolia Hi-Fi, Inc.; Target Corp., Sears, Roebuck, and Co., Kmart Corp.; Office Depot, Inc.; CompuCom Systems, Inc.; Costco Wholesale Corporation; P.C. Richard & Son Long Island Corporation, MARTA Cooperative of America, Inc., and ABC Appliance, Inc.; Schultze Agency Services, LLC on behalf of Tweeter Opco, LLC and Tweeter Newco, LLC; Tech Data Corporation and Tech Data Product Management, Inc.

RESPONDING PARTIES:

Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia).

SET:

One

Pursuant to Federal Rules of Civil Procedure 26 and 34, Direct Action Plaintiffs Direct Action Plaintiffs Electrograph Systems, Inc. and Electrograph Technologies Corp.; John R. Stoebner, as Chapter 7 Trustee for PBE Consumer Electronics, LLC and related entities and Douglas Kelley, as Chapter 11 Trustee for Petters Company, Inc. and related entities, and as Receiver for Petters Company, LLC and related entities; Alfred H. Siegel, solely in his capacity as Trustee of the Circuit City Stores, Inc. Liquidating Trust; Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., Bestbuy.com, L.L.C., and Magnolia Hi-Fi, Inc.; Target Corp., Sears, Roebuck, and Co., Kmart Corp.; Interbond Corporation of America; Office Depot, Inc.; CompuCom Systems, Inc.; Costco Wholesale Corporation; P.C. Richard & Son Long Island Corporation, MARTA Cooperative of America, Inc., and ABC Appliance, Inc.; Schultze Agency Services, LLC on behalf of Tweeter Opco, LLC and Tweeter Newco, LLC; Tech Data Corporation and Tech Data Product Management, Inc. (collectively, "Direct Action Plaintiffs"), through their counsel, request that Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia) (collectively, "Chunghwa Defendants") respond to the following document requests within thirty days of service and produce responsive documents, and afterwards supplement such production as may become necessary to comply with the requirements of Rule 26(e) of the Federal Rules of Civil Procedure.

DEFINITIONS

The words and phrases used in these requests shall have the meanings ascribed to them under the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Northern District of California. In addition, the following terms shall have the meanings set forth below whenever used in any request.

1. The term "Affiliated Entity(ies)" means any entity(ies) involved in the production, pricing, marketing, distribution, and/or sale of CRTs or CRT Products (as those terms are defined herein) at any time during the Relevant Period (as defined herein) in which any of the Chunghwa Defendants (as defined herein), or any division, subdivision, business unit,

1 parent, subsidiary, affiliate, or joint venture thereof, held any ownership interest at any time from
2 March 1, 1995, to the present.

3 2. The words “all,” “any,” and “each” mean “each and every.”

4 3. The words “and” and “or” are both conjunctive and disjunctive as necessary.

5 4. The term “business expenses” includes any and all costs of doing business,
6 including but not limited to any and all taxes, land acquisition costs, rent payments, insurance
7 expenses, utility expenses (including but not limited to payments to vendors providing gas,
8 electric, water, trash disposal, internet, or phone services), office equipment purchases,
9 maintenance and repair expenses, office construction or remodeling expenses, legal
10 representation expenses, accounting expenses, and licensing or permit fees.

11 5. The words “communication” or “correspondence” or words of similar import, in the
12 singular or plural, mean and include without limitation any transmission of documents,
13 conversations, discussions, meetings, or other oral or written exchanges arising out of or
14 concerning the subject matter addressed.

15 6. The term “CRT” means cathode ray tube and includes cathode ray tubes used in
16 color televisions and color computer monitors.

17 7. The term “CRT Manufacturer” means any entity that manufactures CRTs.

18 8. The term “CRT Product” means a television or computer monitor containing a
19 CRT.

20 9. The term “CRT Product Manufacturer” means any entity that manufactures
21 products containing CRTs, including, but not limited to, original equipment manufacturers,
22 original design manufacturers, electronics manufacturing services, contract manufacturers,
23 and/or systems integrators.

24 10. “Document” means, without limitation, the following items, whether printed,
25 recorded, or reproduced by any other mechanical means or process, or written or produced by
26 hand: agreements; contracts; orders; purchase orders; communications; correspondence; letters;
27 emails; telegrams; tape recordings; memoranda; summaries; notes or other recordings of
28 telephone conversations, personal conversations, or meetings; agenda of meetings; notices;

1 minutes; records; calendars; daily diaries; daytimers; statistics; interoffice memoranda; personal
2 memoranda; photographs; photographic slides; motion picture films; audio tapes; charts; graphs;
3 diagrams; drawings; bookkeeping entries; bills; invoices; orders; receipts; canceled checks;
4 vouchers; ledger sheets; computer printouts; statements of witnesses; findings of investigations;
5 files; records of negotiations; reports of experts; reports of consultants; papers; books; bulletins;
6 publications; telefaxes; facsimiles; worksheets; securities; order tickets; records; objects; video
7 tapes; maps; posters; pamphlets; flyers; and any and every other writing or other graphic means
8 by which human intelligence is in any way transmitted or reported. This includes all drafts,
9 alterations, modifications, changes, and amendments of any of the foregoing of which you have
10 knowledge or which are now or were formerly in your actual or constructive possession, custody,
11 or control. A draft or non-identical copy is a separate document within the meaning of this term.

12 11. "Identify," when used with reference to an entity, means to state the full name,
13 present or last known address, and present or last known telephone number of such entity.

14 12. "Identify," when used with reference to documents, other than those under claim
15 of privilege, means to identify the documents by each author, sender, addressee, date, subject,
16 recipient, place of recording, and custodian.

17 13. "Identify" or "identification," when used in reference to an individual person,
18 means to state his or her full name, present or last known address, present or last known
19 telephone number, and present or last known position and business affiliation.

20 14. "Identify," "describe," "explain," or "state," when used in reference to any fact,
21 act occurrence, transaction, statement, communication, document, or other matter, means to
22 describe and identify the facts constituting such matter.

23 15. "Including" or "includes" means without limitation.

24 16. "Reflect(ing) or refer(ring) to" means a statement or communication about,
25 relating to, concerning, describing, containing, identifying, or in any way pertaining to the
26 subject matter in the request.

27 17. The term "Relevant Period" means the period beginning March 1, 1995 and
28 continuing through the present.

18. The terms “You” and “Your” mean the Chunghwa Defendants and/or each of the Chunghwa Defendants, as defined herein.

19. The term “Chunghwa Defendants” refers collectively to Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia), and their predecessors, parents, subsidiaries, or affiliates and segments, departments, or divisions thereof.

20. The term “Proview International Holdings, Ltd.” refers to Proview International Holdings, Ltd. and its predecessors, parents, subsidiaries, or affiliates and segments, departments, or divisions thereof.

21. The term “Proview Technologies, Inc.” refers to Proview Technologies, Inc. and its predecessors, parents, subsidiaries, or affiliates and segments, departments, or divisions thereof.

22. The term “San-Chih Asset International Holding Corp.” refers to San-Chih Asset International Holding Corp. and its predecessors, parents, subsidiaries, or affiliates and segments, departments, or divisions thereof.

23. The term “Shan Chih Assets Development Co., Ltd.” refers to Shan Chih Assets Development Co., Ltd. and its predecessors, parents, subsidiaries, or affiliates and segments, departments, or divisions thereof.

24. The term “Tatung Company” refers to Tatung Company and its predecessors, parents, subsidiaries, or affiliates and segments, departments, or divisions thereof.

INSTRUCTIONS

1. The documents covered by these requests include all documents in your possession, custody, or control.

2. Each document request shall be construed independently, and no document request shall be viewed as limiting the scope of any other document request.

3. Each document request seeks information limited to the Relevant Period, unless stated otherwise.

1 4. You shall produce all documents in the manner in which they are maintained in
2 the usual course of Your business and/or You shall organize and label the documents to
3 correspond to the categories of the requests. A request for a document shall be deemed to
4 include a request for any and all file folders within which the document was contained,
5 transmittal sheets, cover letters, exhibits, attachments, or enclosures to the document in addition
6 to the document itself.

7 5. The fact that a document is produced by another party does not relieve you of the
8 obligation to produce your copy of the same document, even if the two documents are identical.

9 6. If you withhold under any claim of privilege any document or thing or portion
10 thereof requested, then furnish a list specifying each document or thing or part thereof for which
11 the privilege is claimed and the following information about each such item: date, author,
12 recipients and their titles; basis on which the privilege is claimed; the paragraph or sub-paragraph
13 of the request to which the document or thing responds; and a sufficient description of the
14 subject matter of the document or thing (without disclosing its contents) to allow its description
15 to the Court for a ruling on the claim of privilege.

16 7. If any information requested is withheld based on a claim that such information
17 constitutes attorney work-product, please provide all the information described in the previous
18 instruction and identify the litigation in connection with which the information and the
19 information it contains was obtained and/or prepared.

20 8. For each document request with respect to which you assert a claim of privilege,
21 state whether the documents or information requested have ever been provided to the
22 Government or any party, entity, or individual other than the Chunghwa Defendants or their
23 attorneys.

24 9. If any responsive document was but is no longer in your possession or subject to
25 your control, state whether it is: (a) missing or lost; (b) destroyed; (c) otherwise disposed of; or
26 (d) transferred voluntarily or involuntarily to others, and identify the name and address of its
27 current or last known custodian, and the circumstances surrounding such disposition.

1 10. The obligation to respond to these document requests is continuing pursuant to
2 Rule 26(e) of the Federal Rules of Civil Procedure. If at any time after responding to these
3 document requests you discover additional responsive documents that will make your responses
4 to these document requests more complete or correct, amend your responses and produce such
5 responsive documents as soon as reasonably possible, pursuant to the requirements of Rule
6 26(e).

7 11. If an objection is made to a request, or a part of a request, the specific ground for
8 the objection shall be set forth clearly in the response to that request. If you consider only a part
9 of a request to be objectionable, you must specify such part, and must otherwise respond to the
10 remainder of the request.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

Documents sufficient to identify every entity and individual which held an ownership interest in each of the following entities during the Relevant Period, including the amount of ownership interest in each entity held by each owner at all times during the Relevant Period:

- a. Each Chunghwa Defendant;
- b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- c. All other Affiliated Entities.

REQUEST NO. 2:

For each of the following entities, documents sufficient to identify all officers, directors, and board members employed during the Relevant Period, their dates of employment, and their job title and duties:

- a. Each Chunghwa Defendant;
- b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- c. All other Affiliated Entities.

REQUEST NO. 3:

For the Relevant Period, all board of directors meeting minutes of each Chunghwa Defendant that name, mention, or reference any of the following entities:

- a. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

REQUEST NO. 4:

For each of the following entities, organizational charts sufficient to identify all persons, departments, and divisions responsible for the production, pricing, marketing, distribution, and/or sale of CRTs or CRT Products at any time during the Relevant Period:

- a. Each Chunghwa Defendant;
- b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- c. All other Affiliated Entities.

REQUEST NO. 5:

Documents sufficient to identify all employees who were involved in any way in the setting of prices of CRTs sold by any Chunghwa Defendant to any of the following entities:

- a. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

REQUEST NO. 6:

All documents relating to or reflecting the sale, purchase, or transfer of any CRT or CRT Product, including all communications relating to or reflecting the price or negotiation of prices for any such sale, purchase, or transfer, between any Chunghwa Defendant and any of the following entities:

- a. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

REQUEST NO. 7:

All documents from the Relevant Period relating to or reflecting pricing guidelines for CRTs or CRT Products given to or provided by any Chunghwa Defendant by or to any of the following entities:

- 1 a. Proview International Holdings, Ltd., Proview Technologies, Inc., Tatung Company;
2 San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co.,
3 Ltd.; and
4 b. Any other Affiliated Entity.

5 **REQUEST NO. 8:**

6 All communications from the Relevant Period between any Chunghwa Defendant and
7 any of the following entities relating to production levels, output, or line capacity for CRTs or
8 CRT Products made, produced, or manufactured, in whole or in part, by any of the following
9 entities or any Chunghwa Defendant:

- 10 a. Proview International Holdings, Ltd., Proview Technologies, Inc., Tatung Company;
11 San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co.,
12 Ltd.; and
13 b. Any other Affiliated Entity.

14 **REQUEST NO. 9:**

15 All documents from the Relevant Period which relate to or reflect the payment of the
16 salary, retirement benefits, health insurance, medical bills, or any other monetary benefits by any
17 Chunghwa Defendant to any employee of any of the following entities:

- 18 a. Proview International Holdings, Ltd., Proview Technologies, Inc., Tatung Company;
19 San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co.,
20 Ltd.; and
21 b. Any other Affiliated Entity.

22 **REQUEST NO. 10:**

23 All documents from the Relevant Period which relate to or reflect the payment of any
24 business expenses of any of the following entities by any Chunghwa Defendant:

- 25 a. Proview International Holdings, Ltd., Proview Technologies, Inc., Tatung Company;
26 San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co.,
27 Ltd.; and
28 b. Any other Affiliated Entity.

REQUEST NO. 11:

All documents from the Relevant Period which relate to or reflect payment or authorization for payment of any travel expenses by any Chunghwa Defendant for any employee of any of the following entities:

- a. Provview International Holdings, Ltd.; Provview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

REQUEST NO. 12:

All documents from the Relevant Period which relate to or reflect the transfer of money between any Chunghwa Defendant and any of the following entities:

- a. Provview International Holdings, Ltd.; Provview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

REQUEST NO. 13:

All documents from the Relevant Period which relate to or reflect the extension of credit between any Chunghwa Defendant and any of the following entities:

- a. Provview International Holdings, Ltd.; Provview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

REQUEST NO. 14:

All budgets, draft budgets, financial forecasts, and business plans from the Relevant Period provided to any Chunghwa Defendant by any of the following entities:

- a. Provview International Holdings, Ltd.; Provview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and

b. Any other Affiliated Entity.

REQUEST NO. 15:

All documents reflecting or referring to any financial, economic, accounting, or production analyses that any Chunghwa Defendant conducted relating to any of the following entities:

a. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and

b. Any other Affiliated Entity.

REQUEST NO. 16:

All documents reflecting or referring to any contract or agreement, either executed or proposed, between any Chunghwa Defendant and any of the following entities, including but not limited to shared services agreements, transition services agreements, agreements to provide information technology services, and agreements concerning the sale of any products:

a. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and

b. Any other Affiliated Entity.

REQUEST NO. 17:

All communications between any Chunghwa Defendant and any governmental agency or representative (of any locality, county, state, country, or continent) relating to any of the following entities:

a. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and

b. Any other Affiliated Entity.

REQUEST NO. 18:

Documents sufficient to show any instance in which any of the Chunghwa Defendants brought any legal action or proceeding against any of the following entities:

- a. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

REQUEST NO. 19:

Documents sufficient to show any instance in which any Affiliated Entity brought any legal action or proceeding against any of the following entities:

- a. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

REQUEST NO. 20:

Documents sufficient to show any instance in which Proview International Holdings, Ltd., Proview Technologies, Inc., Tatung Company, San-Chih Asset International Holding Corp., or Shan Chih Assets Development Co., Ltd. brought any legal action or proceeding against any of the following entities:

- a. Each Chunghwa Defendant;
- b. Each Affiliated Entity.

REQUEST NO. 21:

Documents sufficient to identify all legal proceedings, court filings, or filings with a governmental agency of any locality, county, state, country, or continent) wherein any Chunghwa Defendant, Proview International Holdings, Ltd., Proview Technologies, Inc., Tatung Company, San-Chih Asset International Holding Corp., Shan Chih Assets Development Co., Ltd., or any other Affiliated Entity claimed protection from antitrust liability pursuant to

1 *Copperweld Corp. v. Independence Tube Corp.*, 467 U.S. 752 (1984), its progeny, or its state
2 law counterparts.

3 **REQUEST NO. 22:**

4 Documents sufficient to show the source (whether a CRT Manufacturer or CRT Product
5 Manufacturer) of the CRTs each of the following entities purchased at any given time during the
6 Relevant Period, including, but not limited to, invoices, inventory data, and contracts for bulk
7 purchases of CRTs:

- 8 a. Each Chunghwa Defendant;
- 9 b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company;
10 San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co.,
11 Ltd.; and
- 12 c. All other Affiliated Entities.

13 **REQUEST NO. 23:**

14 For CRTs purchased by each of the following entities from another CRT Product
15 Manufacturer, which were already integrated into a CRT Product, documents sufficient to show
16 each such CRT Product Manufacturer's CRT sources:

- 17 a. Each Chunghwa Defendant;
- 18 b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company;
19 San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co.,
20 Ltd.; and
- 21 c. All other Affiliated Entities.

22 **REQUEST NO. 24:**

23 Documents sufficient to trace how and when the CRTs or CRT Products each of the
24 following entities purchased were integrated into the purchasing entity's own CRT Products,
25 including, but not limited to the serial numbers, product numbers, model numbers, specifications
26 and/or dates of manufacture for such CRT Products:

- 27 a. Each Chunghwa Defendant;
- 28

- b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- c. All other Affiliated Entities.

REQUEST NO. 25:

Documents sufficient to show the specifications (i.e., size, type, resolution, brightness, contrast ratio, viewing angle, and manufacturer) of each CRT purchased by each of the following entities during the Relevant Period, whether as a stand-alone CRT or as integrated into a CRT Product:

- a. Each Chunghwa Defendant;
- b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- c. All other Affiliated Entities.

REQUEST NO. 26:

Documents sufficient to show the product specifications (*e.g.*, bills of material identifying the CRT specifications or source) and/or marketing or sales brand and model for each CRT Product manufactured by each of the following entities during the Relevant Period:

- a. Each Chunghwa Defendant;
- b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- c. All other Affiliated Entities.

REQUEST NO. 27:

Documents sufficient to identify the CRTs (by manufacturer, type, size, resolution, brightness, contrast ratio, and viewing angle) that each of the following entities installed in each of its CRT Products (by model number and timeframe (*e.g.*, year, quarter, week, or month)) during the Relevant Period:

- 1 a. Each Chunghwa Defendant;
- 2 b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company;
- 3 San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co.,
- 4 Ltd.; and
- 5 c. All other Affiliated Entities.

6 **REQUEST NO. 28:**

7 Documents sufficient to show any and all manufacturers and sizes of CRTs that each of
 8 the following entities approved or preapproved for purchase and use in CRT Products at any
 9 given time during the Relevant Period, including but not limited to any “approved CRT” lists or
 10 similar documents identifying the part number, product number, manufacturer, type, size,
 11 resolution, brightness, contrast ratio, and/or viewing angle of each CRT approved for purchase
 12 and use:

- 13 a. Each Chunghwa Defendant;
- 14 b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company;
- 15 San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co.,
- 16 Ltd.; and
- 17 c. All other Affiliated Entities.

18 If any of the listed entities had different lists of approved CRT Manufacturers for a given CRT
 19 size, end product type, model, or brand, identify the approved CRT Manufacturer(s) at the finest
 20 product granularity at which such approvals were established.

21 **REQUEST NO. 29:**

22 Documents sufficient to identify all of the CRT Products by model number and year (or
 23 month or other time period if not consistent for the year) in which each of the following entities
 24 exclusively used and installed CRTs manufactured by a Defendant or named co-conspirator in
 25 this litigation during the Relevant Period:

- 26 a. Each Chunghwa Defendant;
- 27
- 28

- 1 b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company;
2 San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co.,
3 Ltd.; and
4 c. All other Affiliated Entities.
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 DATED: June 10, 2013

/s/ Philip J. Iovieno

2 William A. Isaacson
3 Jennifer Milici
4 BOIES, SCHILLER & FLEXNER LLP
5 5301 Wisconsin Ave. NW, Suite 800
6 Washington, D.C. 20015
7 Telephone: (202) 237-2727
8 Facsimile: (202) 237-6131
9 Email: wisaacson@bsfllp.com
10 Email: jmilici@bsfllp.com

11 Stuart Singer
12 BOIES, SCHILLER & FLEXNER LLP
13 401 East Las Olas Blvd., Suite 1200
14 Fort Lauderdale, FL 33301
15 Telephone: (954) 356-0011
16 Facsimile: (954) 356-0022
17 Email: ssinger@bsfllp.com

18 Philip J. Iovieno
19 Anne M. Nardacci
20 BOIES, SCHILLER & FLEXNER LLP
21 10 North Pearl Street, 4th Floor
22 Albany, NY 12207
23 Telephone: (518) 434-0600
24 Facsimile: (518) 434-0665
25 Email: piovieno@bsfllp.com
26 Email: anardacci@bsfllp.com

27 *Liaison Counsel for Direct Action Plaintiffs and*
28 *Attorneys for Plaintiffs Electrograph Systems, Inc.,*
Electrograph Technologies, Corp., Office Depot, Inc.,
Compucom Systems, Inc., Interbond Corporation of
America, P.C. Richard & Son Long Island
Corporation, MARTA Cooperative of America, Inc.,
ABC Appliance, Inc., Schultze Agency Services LLC
on behalf of Tweeter Opco, LLC and Tweeter Newco,
LLC

/s/ Kenneth S. Marks

23 H. Lee Godfrey
24 Kenneth S. Marks
25 Jonathan J. Ross
26 Johnny W. Carter
27 David M. Peterson
28 SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, Texas 77002
Telephone: (713) 651-9366
Facsimile: (713) 654-6666

Email: lgodfrey@sumangodfrey.com
Email: kmarks@susmangodfrey.com
Email: jross@susmangodfrey.com
Email: jcarter@susmangodfrey.com
Email: dpeterson@susmangodfrey.com

Parker C. Folse III
Rachel S. Black
Jordan Connors
SUSMAN GODFREY L.L.P.
1201 Third Avenue, Suite 3800
Seattle, Washington 98101-3000
Telephone: (206) 516-3880
Facsimile: (206) 516-3883
Email: pfolse@susmangodfrey.com
Email: rblack@susmangodfrey.com
Email: jconnors@susmangodfrey.com

*Attorneys for Plaintiff Alfred H. Siegel, solely as
Trustee of the Circuit City Stores, Inc. Liquidating
Trust*

/s/ David. J. Burman

David J. Burman (admitted *pro hac vice*)
Cori G. Moore (admitted *pro hac vice*)
Eric J. Weiss (admitted *pro hac vice*)
Nicholas H. Hesterberg (admitted *pro hac vice*)
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000
Email: DBurman@perkinscoie.com
Email: CGMoore@perkinscoie.com
Email: EWeiss@perkinscoie.com
Email: NHesterberg@perkinscoie.com

Joren Bass, Bar No. 208143
JBass@perkinscoie.com
PERKINS COIE LLP
Four Embarcadero Center, Suite 2400
San Francisco, CA 94111-4131
Telephone: 415.344.7120
Facsimile: 415.344.7320

*Attorneys for Plaintiff Costco Wholesale
Corporation*

/s/ Roman M. Silberfeld

Roman M. Silberfeld, (SBN 62783)
David Martinez, (SBN 193183)
ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
2049 Century Park East, Suite 3400
Los Angeles, CA 90067-3208
Telephone: (310) 552-0130
Facsimile: (310) 229-5800
Email: RMSilberfeld@rkmc.com
Email: DMartinez@rkmc.com

*Attorneys For Plaintiffs Best Buy Co., Inc, Best Buy
Purchasing LLC, Best Buy Enterprise Services, Inc.,
Best Buy Stores, L.P., Bestbuy.com, L.L.C., and
Magnolia Hi-Fi, Inc.*

/s/ Jessica L. Meyer

Jessica L. Meyer
James M. Lockhart
James P. McCarthy
Kelly G. Laudon
LINDQUIST & VENNUM P.L.L.P.
4200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
Telephone: (612) 371-3211
Email: jmeyer@lindquist.com
Email: jlockhart@lindquist.com
Email: jmccarthy@lindquist.com
Email: klaudon@lindquist.com

*Attorneys For Plaintiffs Best Buy Co., Inc, Best Buy
Purchasing LLC, Best Buy Enterprise Services, Inc.,
Best Buy Stores, L.P., Bestbuy.com, L.L.C., and
Magnolia Hi-Fi, Inc.*

/s/ Jason C. Murray

Jason C. Murray (CA Bar No. 169806)
CROWELL & MORING LLP
515 South Flower St., 40th Floor
Los Angeles, CA 90071
Telephone: 213-443-5582
Facsimile: 213-622-2690
Email: jmurray@crowell.com

Jerome A. Murphy (*pro hac vice*)
Astor H.L. Heaven (*pro hac vice*)
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: 202-624-2500
Facsimile: 202-628-5116
E-mail: jmurphy@crowell.com

aheaven@crowell.com

Attorneys for Target Corp.

/s/ Richard Alan Arnold

Richard Alan Arnold

William J. Blechman

Kevin J. Murray

KENNY NACHWALTER, P.A.

201 S. Biscayne Blvd., Suite 1100

Miami, FL 33131

Tel: 305-373-1000

Fax: 305-372-1861

Email: rarnold@knpa.com

Email: wblechman@knpa.com

Email: kmurray@knpa.com

*Attorneys for Plaintiff Sears, Roebuck and Co. and
Kmart Corp.*

/s/ Scott N. Wagner

Robert W. Turken

Scott N. Wagner

Bilzin Sumberg Baena Price & Axelrod LLP

1450 Brickell Ave, Suite 2300

Miami, FL 33131-3456

Tel: 305-374-7580

Fax: 305-374-7593

Email: rturken@bilzin.com

Email: swagner@bilzin.com

Stuart Singer

BOIES, SCHILLER & FLEXNER LLP

401 East Las Olas Blvd., Suite 1200

Fort Lauderdale, FL 33301

Telephone: (954) 356-0011

Facsimile: (954) 356-0022

Email: ssinger@bsfllp.com

William A. Isaacson

Jennifer Milici

BOIES, SCHILLER & FLEXNER LLP

5301 Wisconsin Ave. NW, Suite 800

Washington, D.C. 20015

Telephone: (202) 237-2727

Facsimile: (202) 237-6131

Email: wisaacson@bsfllp.com

Email: jmilici@bsfllp.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Philip J. Iovieno
Anne M. Nardacci
BOIES, SCHILLER & FLEXNER LLP
10 North Pearl Street, 4th Floor
Albany, NY 12207
Telephone: (518) 434-0600
Facsimile: (518) 434-0665
Email: piovieno@bsfllp.com
Email: anardacci@bsfllp.com

*Attorneys for Plaintiffs Tech Data Corporation and
Tech Data Product Management, Inc.*

EXHIBIT 3

GIBSON, DUNN & CRUTCHER LLP
JOEL S. SANDERS, SBN 107234
jsanders@gibsondunn.com
RACHEL S. BRASS, SBN 219301
rbrass@gibsondunn.com
555 Mission Street, Suite 3000
San Francisco, CA 94105
Telephone: (415) 393-8200
Facsimile: (415) 986-5309

Attorneys for Defendant
CHUNGHWA PICTURE TUBES, LTD.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re Cathode Ray Tube (CRT) ANTITRUST
LITIGATION

Master File No. 3:07-md-05944 SC
MDL No. 1917

This Document Relates To:

Electrograph Systems, Inc., et al. v. Hitachi, Ltd., et al., No. 11-cv-01656;

Stoebner, et al. v. LG Electronics, et al., No. 11-cv-05381;

Siegel v. Hitachi, Ltd., et al. No. 11-cv-05502;

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al., No. 11-cv-05513;

Target Corp, et al. v. Chunghwa Picture Tubes, Ltd., et al., No. 11-cv-05514;

Interbond Corporation of America v. Hitachi, et al., No. 11-cv-06275;

Office Depot, Inc. v. Hitachi Ltd., et al., No. 11-cv-06276;

CompuCom Systems, Inc. v. Hitachi, Ltd., et al., No. 11-cv-06396;

Costco Wholesale Corporation v. Hitachi, Ltd., et al., No. 11-cv-06397;

**CHUNGHWA PICTURE TUBES, LTD.'S
RESPONSES AND OBJECTIONS TO
DIRECT ACTION PLAINTIFFS' FIRST
SET OF REQUESTS FOR PRODUCTION**

P.C. Richard & Son Long Island Corporation, et al. v. Hitachi, Ltd., et al., No. 12-cv-02648;

Schultze Agency Services, LLC, et al. v. Hitachi, Ltd., et al., No. 12-cv-02649;

Tech Data Corporation, et al. v. Hitachi, Ltd., et al., No. 12-cv-02795-JSM-MAP (M.D. Fla.).

PROPOUNDING PARTIES: Direct Action Plaintiffs

RESPONDING PARTY: Chunghwa Picture Tubes, Ltd.

SET: One

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant Chunghwa Picture Tubes, Ltd. ("CPT") objects and responds to Direct Action Plaintiffs Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., Bestbuy.com, L.L.C., and Magnolia Hi-Fi, Inc.; Target Corp., Sears, Roebuck, and Co., Kmart Corp.; Interbond Corporation of America; Office Depot, Inc.; CompuCom Systems, Inc.; Costco Wholesale Corporation; P.C. Richard & Son Long Island Corporation, MARTA Cooperative of America, Inc., and ABC Appliance, Inc.; Schultze Agency Services, LLC on behalf of Tweeter Opco, LLC and Tweeter Newco, LLC; Tech Data Corporation and Tech Data Product Management, Inc. (collectively, "Plaintiffs") First Set of Requests for Production ("Requests"), dated June 10, 2013.

PRELIMINARY STATEMENT

CPT has not completed its investigation relating to this action, has not completed discovery in this action, and has not completed preparation for trial. As discovery proceeds, facts, information, evidence, documents and things may be discovered that are not set forth in these responses, but which may have been responsive to these Requests. The following responses are based on CPT's knowledge, information and belief at this time and are complete as to CPT's best knowledge at this time. Furthermore, these responses were prepared based on CPT's good faith interpretation and understanding of the Requests and are subject to correction for inadvertent errors or omissions, if any.

CPT reserves the right to refer to, conduct discovery with reference to, or to offer into evidence at the time of trial, any and all facts, evidence, documents and things developed during the course of discovery and trial preparation, notwithstanding the reference to facts, evidence, documents and things in these responses. In addition, CPT assumes no obligation to voluntarily supplement or amend these responses to reflect information, evidence, documents or things discovered following service of these responses. Nevertheless, these responses are given without prejudice to subsequent revision or supplementation, including objections, based upon any information, evidence and documentation, which hereinafter may be discovered.

GENERAL OBJECTIONS & RESPONSES

CPT incorporates the following General Objections and Responses into the specific Responses set forth below. CPT does not waive any of these General Objections in its Responses to the specific Requests propounded. Any specific objection made by CPT in no respect limits or modifies these General Objections.

1. CPT objects generally to Plaintiffs' Requests to the extent they seek to impose obligations beyond those imposed by the Federal Rules of Civil Procedure, the Local Rules for the Northern District of California, or any rules and orders of the Court.

2. CPT objects generally to Plaintiffs' Requests to the extent that they seek disclosure of information subject to the attorney-client privilege, attorney work product doctrine, joint defense privilege, or any other applicable privilege or protection available under any and all applicable laws. Any inadvertent disclosure of privileged information shall not constitute a waiving any otherwise valid claim of privilege, and any failure to assert a privilege as to one document or communication shall not be deemed to constitute a waiving the privilege as to any other document or communication so protected.

3. CPT objects generally to Plaintiffs' Requests to the extent they seek information not within CPT's possession, custody, or control.

4. CPT objects generally to the Requests on the grounds that they are "unreasonably cumulative or duplicative" and "the burden or expense of the proposed discovery outweighs its likely benefit." Fed. R. Civ. P. 26(b)(2).

5. CPT objects generally to Plaintiffs' Requests to the extent they seek information containing or relating to trade secrets, proprietary, or confidential information protected by constitutional, statutory or common law rights of privacy. *See, e.g.*, Cal. Const. art. I, § 1.

6. CPT objects generally to the Requests because, given their scope, preparing a substantive response is overly burdensome.

7. CPT objects generally to Plaintiffs' Requests to the extent they seek information that is not relevant to the claims or defenses of any party in this action.

8. CPT objects generally to Plaintiffs' Requests, including the Definitions, to the extent they contain misstatements of fact or law or inaccurate assumptions. Nothing in these Responses shall be construed as constituting or implying an admission of any allegation or agreement with any assertion, assumption or characterization in the Requests.

9. CPT objects generally to Plaintiffs' Requests to the extent Plaintiffs purport to seek a separate response from Chunghwa Picture Tubes (Malaysia), which ceased to exist in 2011.

10. CPT objects to Plaintiffs' definition of the term "Chunghwa Defendants," which includes all "predecessors, parents, subsidiaries, or affiliates and segments, departments, or divisions" of Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes Malaysia, because this definition is overly broad and unduly burdensome. Further, it improperly purports to seek information from distinct corporate entities and persons not parties to the current action and not controlled by CPT. CPT further objects because the phrase "predecessors, parents, subsidiaries, or affiliates and segments, departments or divisions" in this definition is vague and ambiguous, including with respect to which entities Plaintiffs contend fulfill that role and the time period referenced. CPT's responses to Plaintiffs' Requests interpret this term to refer only to CPT and CPT Malaysia and not to any purported "predecessors, parents, subsidiaries, or affiliates and segments, departments, or divisions."

11. CPT objects to Plaintiffs' definition of the term "Proview International Holdings, Ltd.," which includes all "predecessors, parents, subsidiaries, or affiliates and segments, departments, or divisions thereof," because this definition is overly broad and unduly burdensome. Further, it improperly purports to seek information from distinct corporate entities and persons not parties to the current action and not controlled by CPT. CPT further objects because the phrase "predecessors,

1 parents, subsidiaries, or affiliates and segments, departments or divisions” in this definition is vague
2 and ambiguous, including with respect to which entities Plaintiffs contend fulfill that role and the
3 time period referenced. CPT’s responses to Plaintiffs’ Requests interpret this term to refer only to
4 Proview International Holdings, Ltd. and not to any purported “predecessors, parents, subsidiaries, or
5 affiliates and segments, departments, or divisions thereof.”

6 12. CPT objects to Plaintiffs’ definition of the term “Proview Technologies, Inc.,” which
7 includes all “predecessors, parents, subsidiaries, or affiliates and segments, departments, or divisions
8 thereof,” because this definition is overly broad and unduly burdensome. Further, it improperly
9 purports to seek information from distinct corporate entities and persons not parties to the current
10 action and not controlled by CPT. CPT further objects because the phrase “predecessors, parents,
11 subsidiaries, or affiliates and segments, departments or divisions” in this definition is vague and
12 ambiguous, including with respect to which entities Plaintiffs contend fulfill that role and the time
13 period referenced. CPT’s responses to Plaintiffs’ Requests interpret this term to refer only to
14 Proview Technologies, Inc. and not to any purported “predecessors, parents, subsidiaries, or affiliates
15 and segments, departments, or divisions thereof.”

16 13. CPT objects to Plaintiffs’ definition of the term “San-Chih Asset International Holding
17 Corp.” which includes all “predecessors, parents, subsidiaries, or affiliates and segments,
18 departments, or divisions thereof,” because this definition is overly broad and unduly burdensome.
19 Further, it improperly purports to seek information from distinct corporate entities and persons not
20 parties to the current action and not controlled by CPT. CPT further objects because the phrase
21 “predecessors, parents, subsidiaries, or affiliates and segments, departments or divisions” in this
22 definition is vague and ambiguous, including with respect to which entities Plaintiffs contend fulfill
23 that role and the time period referenced. CPT’s responses to Plaintiffs’ Requests interpret this term to
24 refer only to San-Chih Asset International Holding Corp. and not to any purported “predecessors,
25 parents, subsidiaries, or affiliates and segments, departments, or divisions thereof.”

26 14. CPT objects to Plaintiffs’ definition of the term “San Chih Assets Development Co.,
27 Ltd.” which includes all “predecessors, parents, subsidiaries, or affiliates and segments, departments,
28 or divisions thereof,” because this definition is overly broad and unduly burdensome. Further, it

1 improperly purports to seek information from distinct corporate entities and persons not parties to the
2 current action and not controlled by CPT. CPT further objects because the phrase “predecessors,
3 parents, subsidiaries, or affiliates and segments, departments or divisions” in this definition is vague
4 and ambiguous, including with respect to which entities Plaintiffs contend fulfill that role and the
5 time period referenced. CPT’s responses to Plaintiffs’ Requests interpret this term to refer only to
6 San Chih Assets Development Co., Ltd. and not to any purported “predecessors, parents, subsidiaries,
7 or affiliates and segments, departments, or divisions thereof.”

8 15. CPT objects to Plaintiffs’ definition of the term “Tatung Company” which includes all
9 “predecessors, parents, subsidiaries, or affiliates and segments, departments, or divisions thereof,”
10 because this definition is overly broad and unduly burdensome. Further, it improperly purports to
11 seek information from distinct corporate entities and persons not parties to the current action and not
12 controlled by CPT. CPT further objects because the phrase “predecessors, parents, subsidiaries, or
13 affiliates and segments, departments or divisions” in this definition is vague and ambiguous,
14 including with respect to which entities Plaintiffs contend fulfill that role and the time period
15 referenced. CPT’s responses to Plaintiffs’ Requests interpret this term to refer only to Tatung
16 Company and not to any purported “predecessors, parents, subsidiaries, or affiliates and segments,
17 departments, or divisions thereof.”

18 16. CPT objects to the definition of the term “AFFILIATED ENTITIES,” which purports
19 to apply to “*any* entity(ies) involved in the production, pricing, marketing, distribution and/or sale of
20 CRTs or CRT Products . . . at *any* time during the Relevant Period . . . in which *any* of the Chunghwa
21 Defendants . . . or *any* division, subdivision, business unit, parent, subsidiary, affiliate, or joint
22 venture thereof, held *any* ownership interest at any time from March 1, 1995 to the present,” as vague,
23 overbroad, and unduly burdensome. Should Plaintiffs wish for CPT to search for potentially
24 responsive information regarding a particular entity or entities, CPT is willing to meet and confer
25 regarding a revised definition to this term.

26 17. CPT objects to these Requests for Production insofar as they have been served on
27 behalf of Circuit City and Electrograph in violation of CPT’s settlement agreements with those
28 parties. CPT is not responding to the Requests served by Circuit City and Electrograph.

18. CPT objects to these Requests for Production insofar as they have been served on behalf of John R. Stoenner, as Chapter 7 Trustee for PBE Consumer Electronics, LLC and related entities and Douglas Kelley, as Chapter 11 Trustee for Petters Company, Inc. and related entities, and as Receiver for Petters Company, LLC and related entities. CPT has not been served in the action brought by those entities and such discovery is therefore not proper.

19. CPT reserves all other objections, including but not limited to objections to the relevance, admissibility, or authenticity of all documents or information provided.

SPECIFIC RESPONSES AND OBJECTIONS

REQUEST NO. 1:

Documents sufficient to identify every entity and individual which held an ownership interest in each of the following entities during the Relevant Period, including the amount of ownership interest in each entity held by each owner at all times during the Relevant Period:

- a. Each Chunghwa Defendant;
- b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- c. All other Affiliated Entities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound and seeking information outside of CPT's custody or control. CPT further objects to this Request as overly broad and because the burden and expense of the proposed discovery far outweighs its likely benefit. CPT further objects because this Request seeks information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. CPT further states that the information sought regarding Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; and Shan Chih Assets Development Co., Ltd.—entities entirely distinct from CPT—is not within CPT's custody or control, as are documents that would identify every entity and individual holding an ownership in CPT, a publicly traded company.

Subject to, and without waiving the foregoing objections, CPT states that it will produce documents sufficient to identify CPT's significant shareholders.

REQUEST NO. 2:

For each of the following entities, documents sufficient to identify all officers, directors, and board members employed during the Relevant Period, their dates of employment, and their job title and duties:

- a. Each Chunghwa Defendant;
- b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- c. All other Affiliated Entities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound, and to the extent it asks for information outside of CPT's custody or control. CPT further objects to this Request as overly broad and seeking information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. CPT further states that the information sought regarding Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; and Shan Chih Assets Development Co., Ltd.—entities entirely distinct from CPT—is either publicly available (and thus, equally available to Plaintiffs) or not within CPT's custody or control. Subject to, and without waiving the foregoing objections, CPT will produce documents sufficient to show the names and job titles of its officers, directors and board members during the Relevant Period.

REQUEST NO. 3:

For the Relevant Period, all board of directors meeting minutes of each Chunghwa Defendant that name, mention, or reference any of the following entities:

- a. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and

b. Any other Affiliated Entity.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound, and to the extent it asks for information outside of CPT's custody or control. CPT further objects because this Request seeks information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. CPT further objects to this Request to the extent that it seeks privileged and confidential information. CPT further objects to this Request as overly broad and unduly burdensome: Conducting a reasonable search for responsive materials at CPT would require translation and review of voluminous documents, the burden and expense of which would far outweigh its likely benefit. CPT further states that the information sought regarding Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; and Shan Chih Assets Development Co., Ltd.—entities entirely distinct from CPT—is not within CPT's custody or control. CPT is willing to meet and confer with Plaintiffs' counsel regarding a response to a more narrowly tailored Request.

REQUEST NO. 4:

For each of the following entities, organizational charts sufficient to identify all persons, departments, and divisions responsible for the production, pricing, marketing, distribution, and/or sale of CRTs or CRT Products at any time during the Relevant Period:

- a. Each Chunghwa Defendant;
- b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- c. All other Affiliated Entities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound. Subject to, and without waiving the foregoing objections, CPT refers

1 Plaintiffs to its prior productions for CPT's organizational charts, including those of CPT Malaysia,
2 to the extent they exist.

3 **REQUEST NO. 5:**

4 Documents sufficient to identify all employees who were involved in any way in the setting of
5 prices of CRTs sold by any Chunghwa Defendant to any of the following entities:

- 6 a. Provview International Holdings, Ltd.; Provview Technologies, Inc.; Tatung Company;
7 San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co.,
8 Ltd.; and
9 b. Any other Affiliated Entity.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

11 CPT incorporates the General Objections and Responses set forth above. CPT further objects
12 to this Request as compound. Subject to, and without waiving the foregoing objections, CPT refers
13 Plaintiffs to its prior productions for materials responsive to this Request.

14 **REQUEST NO. 6:**

15 All documents relating to or reflecting the sale, purchase, or transfer of any CRT or CRT
16 Product, including all communications relating to or reflecting the price or negotiation of prices for
17 any such sale, purchase, or transfer, between any Chunghwa Defendant and any of the following
18 entities:

- 19 a. Provview International Holdings, Ltd.; Provview Technologies, Inc.; Tatung Company;
20 San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co.,
21 Ltd.; and
22 b. Any other Affiliated Entity.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

24 CPT incorporates the General Objections and Responses set forth above. CPT further objects
25 to this Request as compound, and to the extent it asks for information outside of CPT's custody or
26 control. CPT further objects to this Request as overly broad and because the burden and expense of
27 the proposed discovery far outweighs its likely benefit. Subject to, and without waiving the
28

1 foregoing objections, CPT refers Plaintiffs to its previous productions for information regarding
 2 customer/supplier transactions between CPT or CPT Malaysia and customers.

3 **REQUEST NO. 7:**

4 All documents from the Relevant Period relating to or reflecting pricing guidelines for CRTs
 5 or CRT Products given to or provided by any Chunghwa Defendant by or to any of the following
 6 entities:

- 7 a. Proview International Holdings, Ltd., Proview Technologies, Inc., Tatung Company;
 8 San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co.,
 9 Ltd.; and
 10 b. Any other Affiliated Entity.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

12 CPT incorporates the General Objections and Responses set forth above. CPT further objects
 13 to this Request as compound, and to the extent it asks for information outside of CPT's custody or
 14 control. CPT further objects to this Request as overly broad and because the burden and expense of
 15 the proposed discovery far outweighs its likely benefit. CPT further objects to the use of the term
 16 "pricing guidelines" as vague and ambiguous. Subject to, and without waiving the foregoing
 17 objections, CPT responds as follows: CPT is unaware of any documents within its control that are
 18 responsive to this request.

19 **REQUEST NO. 8:**

20 All communications from the Relevant Period between any Chunghwa Defendant and any of
 21 the following entities relating to production levels, output, or line capacity for CRTs or CRT Products
 22 made, produced, or manufactured, in whole or in part, by any of the following entities or any
 23 Chunghwa Defendant:

- 24 a. Proview International Holdings, Ltd., Proview Technologies, Inc., Tatung Company;
 25 San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co.,
 26 Ltd.; and
 27 b. Any other Affiliated Entity.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound, vague, and unintelligible. CPT is willing to meet and confer with Plaintiffs' counsel regarding what information Plaintiffs seek to obtain through this Request.

REQUEST NO. 9:

All documents from the Relevant Period which relate to or reflect the payment of the salary, retirement benefits, health insurance, medical bills, or any other monetary benefits by any Chunghwa Defendant to any employee of any of the following entities:

- a. Proview International Holdings, Ltd., Proview Technologies, Inc., Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound. CPT further objects to this Request as overly broad and because the burden and expense of the proposed discovery far outweighs its likely benefit. CPT further objects to this Request as seeking confidential information that may violate the privacy rights of third parties. CPT further objects to the use of the term "monetary benefits" as vague and ambiguous. Subject to, and without waiving the foregoing objections, CPT states that it is unaware of any documents responsive to this request.

REQUEST NO. 10:

All documents from the Relevant Period which relate to or reflect the payment of any business expenses of any of the following entities by any Chunghwa Defendant:

- a. Proview International Holdings, Ltd., Proview Technologies, Inc., Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound. CPT further objects because this Request seeks information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. CPT further objects to this Request as overly broad and because the burden and expense of the proposed discovery far outweighs its likely benefit. CPT further objects to the use of the term “business expenses” as vague and ambiguous. CPT is willing to meet and confer with Plaintiffs’ counsel regarding what information Plaintiffs seek to obtain through this Request.

REQUEST NO. 11:

All documents from the Relevant Period which relate to or reflect payment or authorization for payment of any travel expenses by any Chunghwa Defendant for any employee of any of the following entities:

- a. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound. CPT further objects because this Request seeks information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. CPT further objects to this Request as overly broad and because the burden and expense of the proposed discovery far outweighs its likely benefit. Subject to, and without waiving the foregoing objections, CPT will produce documents sufficient to show any payments of travel expenses for CPT’s board members, including individuals employed by Tatung Company. CPT is unaware of any responsive documents within its custody or control relating to Proview International Holdings, Ltd.; Proview Technologies, Inc.; San-Chih Asset International Holding Corp.; or Shan Chih Assets Development Co., Ltd.

REQUEST NO. 12:

All documents from the Relevant Period which relate to or reflect the transfer of money between any Chunghwa Defendant and any of the following entities:

- a. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound. CPT further objects because this Request seeks information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. CPT further objects to this Request as overly broad and because the burden and expense of the proposed discovery far outweighs its likely benefit. Subject to, and without waiving the foregoing objections, CPT will produce documents sufficient to show any transfers of money between CPT and Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; or Shan Chih Assets Development Co., Ltd., to the extent any such transfers occurred and to the extent such documents were not previously produced.

REQUEST NO. 13:

All documents from the Relevant Period which relate to or reflect the extension of credit between any Chunghwa Defendant and any of the following entities:

- a. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound. CPT further objects because this Request seeks information that is

neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. CPT further objects to this Request as overly broad and because the burden and expense of the proposed discovery far outweighs its likely benefit. Subject to, and without waiving the foregoing objections, CPT will produce documents sufficient to show any extensions of credit between CPT and Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; or Shan Chih Assets Development Co., Ltd., to the extent any such extensions of credit occurred and to the extent such documents were not previously produced.

REQUEST NO. 14:

All budgets, draft budgets, financial forecasts, and business plans from the Relevant Period provided to any Chunghwa Defendant by any of the following entities:

- a. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound. CPT further objects because this Request seeks information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving the foregoing objections, CPT states that CPT is unaware of any such documents.

REQUEST NO. 15:

All documents reflecting or referring to any financial, economic, accounting, or production analyses that any Chunghwa Defendant conducted relating to any of the following entities:

- a. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound. CPT further objects because this Request seeks information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving the foregoing objections, CPT states that CPT is unaware of any such documents responsive to this request.

REQUEST NO. 16:

All documents reflecting or referring to any contract or agreement, either executed or proposed, between any Chunghwa Defendant and any of the following entities, including but not limited to shared services agreements, transition services agreements, agreements to provide information technology services, and agreements concerning the sale of any products:

- a. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound. CPT further objects because this Request seeks information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. CPT further objects to this Request to the extent it seeks privileged information. Subject to, and without waiving the foregoing objections, CPT refers Plaintiffs to its previous productions for information regarding any customer/supplier transactions between CPT and Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; or Shan Chih Assets Development Co., Ltd. CPT is unaware of any agreements with these entities that would fall outside of the normal course of a customer/supplier relationship.

REQUEST NO. 17:

All communications between any Chunghwa Defendant and any governmental agency or representative (of any locality, county, state, country, or continent) relating to any of the following entities:

- a. Provview International Holdings, Ltd.; Provview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound. CPT further objects because this Request seeks information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. CPT further objects to this Request as overbroad and because the burden and expense of the proposed discovery far outweighs its likely benefit. CPT is willing to meet and confer with Plaintiffs' counsel regarding a response to a more narrowly tailored Request.

REQUEST NO. 18:

Documents sufficient to show any instance in which any of the Chunghwa Defendants brought any legal action or proceeding against any of the following entities:

- a. Provview International Holdings, Ltd.; Provview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18:

CPT incorporates the General Objections and Responses set forth above. CPT further objects because this Request seeks information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving the foregoing objections, CPT states that CPT is unaware of any such documents regarding Tatung Company, San-Chih Asset International Holding Corp., or Shan Chih Assets Development

Co., Ltd. On July 5, 2011, CPT filed a claim against Proview in District Court in Taipei, Taiwan. On May 21, 2012, CPT filed a claim against Proview in Shenzhen, PRC. CPT will produce the complaints filed in these proceedings.

REQUEST NO. 19:

Documents sufficient to show any instance in which any Affiliated Entity brought any legal action or proceeding against any of the following entities:

- a. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- b. Any other Affiliated Entity.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound. CPT further objects because this Request seeks information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. CPT further objects to this Request to the extent it seeks information outside of CPT's custody or control. CPT further objects to this Request as overbroad and unduly burdensome, given its incorporation of the overly broad term "Affiliated Entities" and its request for information over an 18-year period. CPT is willing to meet and confer with Plaintiffs' counsel regarding a response to a more narrowly tailored Request.

REQUEST NO. 20:

Documents sufficient to show any instance in which Proview International Holdings, Ltd., Proview Technologies, Inc., Tatung Company, San-Chih Asset International Holding Corp., or Shan Chih Assets Development Co., Ltd. brought any legal action or proceeding against any of the following entities:

- a. Each Chunghwa Defendant;
- b. Each Affiliated Entity.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

CPT incorporates the General Objections and Responses set forth above. CPT further objects because this Request seeks information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving the foregoing objections, CPT states that CPT is unaware of any documents responsive to this Request.

REQUEST NO. 21:

Documents sufficient to identify all legal proceedings, court filings, or filings with a governmental agency of any locality, county, state, country, or continent) wherein any Chunghwa Defendant, Proview International Holdings, Ltd., Proview Technologies, Inc., Tatung Company, San-Chih Asset International Holding Corp., Shan Chih Assets Development Co., Ltd., or any other Affiliated Entity claimed protection from antitrust liability pursuant to *Copperweld Corp. v. Independence Tube Corp.*, 467 U.S. 752 (1984), its progeny, or its state law counterparts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound, and to the extent it asks for information outside of CPT's custody or control. CPT further objects to this Request as overly broad and seeking information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. CPT further states that the information sought regarding Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; and Shan Chih Assets Development Co., Ltd.—entities entirely distinct from CPT—is not within CPT's custody or control. Subject to, and without waiving the foregoing objections, CPT is not aware of any documents within its custody or control that are responsive to this Request.

REQUEST NO. 22:

Documents sufficient to show the source (whether a CRT Manufacturer or CRT Product Manufacturer) of the CRTs each of the following entities purchased at any given time during the Relevant Period, including, but not limited to, invoices, inventory data, and contracts for bulk purchases of CRTs:

- a. Each Chunghwa Defendant;
- b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- c. All other Affiliated Entities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound, and to the extent it asks for information outside of CPT's custody or control. CPT further objects to this Request as overly broad and seeking information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving the foregoing objections, CPT refers Plaintiffs to its previously produced transactional data regarding the sale of the CRTs manufactured by CPT and its subsidiaries. CPT further states that additional information sought regarding Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; and Shan Chih Assets Development Co., Ltd.—entities entirely distinct from CPT—is not within CPT's custody or control. CPT is not aware of any documents within its custody or control, not previously produced, that are responsive to this Request, because CPT and CPT Malaysia did not purchase CRTs during the Relevant Period.

REQUEST NO. 23:

For CRTs purchased by each of the following entities from another CRT Product Manufacturer, which were already integrated into a CRT Product, documents sufficient to show each such CRT Product Manufacturer's CRT sources:

- a. Each Chunghwa Defendant;
- b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- c. All other Affiliated Entities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound, and to the extent it asks for information outside of CPT's custody or control. CPT further objects to this Request as overly broad and seeking information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving the foregoing objections, CPT refers Plaintiffs to its previously produced transactional data regarding the sale of CRTs manufactured by CPT and its subsidiaries. CPT further states that additional information sought regarding Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; and Shan Chih Assets Development Co., Ltd.—entities entirely distinct from CPT—is not within CPT's custody or control. CPT is not aware of any documents within its custody or control, not previously produced, that are responsive to this Request, because CPT and CPT Malaysia did not purchase or manufacture CRT Products during the Relevant Period.

REQUEST NO. 24:

Documents sufficient to trace how and when the CRTs or CRT Products each of the following entities purchased were integrated into the purchasing entity's own CRT Products, including, but not limited to the serial numbers, product numbers, model numbers, specifications and/or dates of manufacture for such CRT Products:

- a. Each Chunghwa Defendant;
- b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- c. All other Affiliated Entities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound, and to the extent it asks for information outside of CPT's custody or control. CPT further objects to this Request as overly broad and seeking information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of

admissible evidence. Subject to, and without waiving the foregoing objections, CPT refers Plaintiffs to its previously produced transactional data regarding the sale of CRTs manufactured by CPT and its subsidiaries. CPT further states that additional information sought regarding Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; and Shan Chih Assets Development Co., Ltd.—entities entirely distinct from CPT—is not within CPT’s custody or control. CPT is not aware of any documents within its custody or control, not previously produced, that are responsive to this Request, because CPT and CPT Malaysia did not purchase or manufacture CRT Products during the Relevant Period.

REQUEST NO. 25:

Documents sufficient to show the specifications (i.e., size, type, resolution, brightness, contrast ratio, viewing angle, and manufacturer) of each CRT purchased by each of the following entities during the Relevant Period, whether as a stand-alone CRT or as integrated into a CRT

Product:

- a. Each Chunghwa Defendant;
- b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- c. All other Affiliated Entities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound, and to the extent it asks for information outside of CPT’s custody or control. CPT further objects to this Request as overly broad and seeking information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving the foregoing objections, CPT refers Plaintiffs to its previously produced transactional data regarding the sale of CRTs manufactured by CPT and its subsidiaries. CPT further states that additional information sought regarding Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; and Shan Chih Assets Development Co., Ltd.—entities entirely distinct from CPT—is not

within CPT's custody or control. CPT is not aware of any documents within its custody or control, not previously produced, that are responsive to this Request, because CPT and CPT Malaysia did not purchase or manufacture CRT Products during the Relevant Period.

REQUEST NO. 26:

Documents sufficient to show the product specifications (*e.g.*, bills of material identifying the CRT specifications or source) and/or marketing or sales brand and model for each CRT Product manufactured by each of the following entities during the Relevant Period:

- a. Each Chunghwa Defendant;
- b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co., Ltd.; and
- c. All other Affiliated Entities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 26:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound, and to the extent it asks for information outside of CPT's custody or control. CPT further objects to this Request as overly broad and seeking information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving the foregoing objections, CPT refers Plaintiffs to its previously produced transactional data and documents. CPT further states that additional information sought regarding Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; and Shan Chih Assets Development Co., Ltd.—entities entirely distinct from CPT—is not within CPT's custody or control. CPT is not aware of any documents within its custody or control, not previously produced, that are responsive to this Request.

REQUEST NO. 27:

Documents sufficient to identify the CRTs (by manufacturer, type, size, resolution, brightness, contrast ratio, and viewing angle) that each of the following entities installed in each of its

1 CRT Products (by model number and timeframe (*e.g.*, year, quarter, week, or month)) during the
 2 Relevant Period:

- 3 a. Each Chunghwa Defendant;
- 4 b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company;
 5 San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co.,
 6 Ltd.; and
- 7 c. All other Affiliated Entities.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 27:**

9 CPT incorporates the General Objections and Responses set forth above. CPT further objects
 10 to this Request as compound, and to the extent it asks for information outside of CPT's custody or
 11 control. CPT further objects to this Request as overly broad and seeking information that is neither
 12 relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of
 13 admissible evidence. Subject to, and without waiving the foregoing objections, CPT refers Plaintiffs
 14 to its previously produced transactional data and documents. CPT further states that additional
 15 information sought regarding Proview International Holdings, Ltd.; Proview Technologies, Inc.;
 16 Tatung Company; San-Chih Asset International Holding Corp.; and Shan Chih Assets Development
 17 Co., Ltd.—entities entirely distinct from CPT—is not within CPT's custody or control. CPT is not
 18 aware of any documents within its custody or control, not previously produced, that are responsive to
 19 this Request.

20 **REQUEST NO. 28:**

21 Documents sufficient to show any and all manufacturers and sizes of CRTs that each of the
 22 following entities approved or preapproved for purchase and use in CRT Products at any given time
 23 during the Relevant Period, including but not limited to any "approved CRT" lists or similar
 24 documents identifying the part number, product number, manufacturer, type, size, resolution,
 25 brightness, contrast ratio, and/or viewing angle of each CRT approved for purchase and use:

- 26 a. Each Chunghwa Defendant;

- b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company;
San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co.,
Ltd.; and
- c. All other Affiliated Entities.

If any of the listed entities had different lists of approved CRT Manufacturers for a given CRT size, end product type, model, or brand, identify the approved CRT Manufacturer(s) at the finest product granularity at which such approvals were established.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound, and to the extent it asks for information outside of CPT's custody or control. CPT further objects to this Request as overly broad and seeking information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving the foregoing objections, CPT states that information sought regarding Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; and Shan Chih Assets Development Co., Ltd.—entities entirely distinct from CPT—is not within CPT's custody or control. CPT is not aware of any documents within its custody or control, not previously produced, that are responsive to this Request.

REQUEST NO. 29:

Documents sufficient to identify all of the CRT Products by model number and year (or month or other time period if not consistent for the year) in which each of the following entities exclusively used and installed CRTs manufactured by a Defendant or named co-conspirator in this litigation during the Relevant Period:

- a. Each Chunghwa Defendant;
- b. Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company;
San-Chih Asset International Holding Corp.; Shan Chih Assets Development Co.,
Ltd.; and
- c. All other Affiliated Entities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29:

CPT incorporates the General Objections and Responses set forth above. CPT further objects to this Request as compound, and to the extent it asks for information outside of CPT's custody or control. CPT further objects to this Request as overly broad and seeking information that is neither relevant to the claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving the foregoing objections, CPT states that information sought regarding Proview International Holdings, Ltd.; Proview Technologies, Inc.; Tatung Company; San-Chih Asset International Holding Corp.; and Shan Chih Assets Development Co., Ltd.—entities entirely distinct from CPT—is not within CPT's custody or control. CPT is not aware of any documents within its custody or control, not previously produced, that are responsive to this Request.

DATED: August 14, 2013

GIBSON, DUNN & CRUTCHER LLP
 JOEL S. SANDERS (jsanders@gibsondunn.com)
 RACHEL S. BRASS (rbrass@gibsondunn.com)

By: /s/ Rachel S. Brass
 Rachel S. Brass

Attorneys for Defendant
 CHUNGHWA PICTURE TUBES, LTD.

EXHIBIT 4

William A. Isaacson
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Ave. NW, Suite 800
Washington, D.C. 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131
Email: wisaacson@bsflp.com

Philip J. Iovieno
Anne M. Nardacci
BOIES, SCHILLER & FLEXNER LLP
30 South Pearl St., 11th Floor
Albany, NY 12207
Telephone: (518) 434-0600
Facsimile: (518) 434-0665
Email: piovieno@bsflp.com
Email: anardacci@bsflp.com

Liaison Counsel for Direct Action Plaintiffs

[additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-md-05944-SC

MDL No. 1917.

This Document Relates To:

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
No. 11-cv-05513;

*Target Corp, et al. v. Chunghwa Picture
Tubes, Ltd., et al.*, No. 11-cv-05514;

*Interbond Corporation of America v. Hitachi,
et al.*, No. 11-cv-06275;

Office Depot, Inc. v. Hitachi Ltd., et al.,
No. 11-cv-06276;

*CompuCom Systems, Inc. v. Hitachi, Ltd.,
et al.*, No. 11-cv-06396;

*P.C. Richard & Son Long Island Corporation,
et al. v. Hitachi, Ltd., et al.*, No. 12-cv-02648;

*Schultze Agency Services, LLC, et al. v.
Hitachi, Ltd., et al.*, No. 12-cv-02649;

*Tech Data Corporation, et al. v. Hitachi, Ltd.,
et al.*, No. 13-cv-00157-SC

**DIRECT ACTION PLAINTIFFS'
SECOND SET OF REQUESTS FOR
PRODUCTION TO DEFENDANTS
CHUNGHWA PICTURE TUBES, LTD.
and CHUNGHWA PICTURE TUBES
(MALAYSIA).**

PROPOUNDING PARTIES:

Direct Action Plaintiffs Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., Bestbuy.com, L.L.C., and Magnolia Hi-Fi, LLC; Target Corp., Sears, Roebuck, and Co., Kmart Corp.; Interbond Corporation of America; Office Depot, Inc.; CompuCom Systems, Inc.; P.C. Richard & Son Long Island Corporation, MARTA Cooperative of America, Inc., and ABC Appliance, Inc.; Schultze Agency Services, LLC on behalf of Tweeter Opco, LLC and Tweeter Newco, LLC; Tech Data Corporation and Tech Data Product Management, Inc.

RESPONDING PARTIES:

Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia).

SET:

Two

Pursuant to Federal Rules of Civil Procedure 26 and 34, Direct Action Plaintiffs Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., Bestbuy.com, L.L.C., and Magnolia Hi-Fi, LLC; Target Corp., Sears, Roebuck, and Co., Kmart Corp.; Interbond Corporation of America; Office Depot, Inc.; CompuCom Systems, Inc.; P.C. Richard & Son Long Island Corporation, MARTA Cooperative of America, Inc., and ABC Appliance, Inc.; Schultze Agency Services, LLC on behalf of Tweeter Opco, LLC and Tweeter Newco, LLC; Tech Data Corporation and Tech Data Product Management, Inc. (collectively, “Direct Action Plaintiffs”), through their counsel, request that Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia) (collectively, “Chunghwa Defendants”) respond to the following document requests within thirty days of service and produce responsive documents, and afterwards supplement such production as may become necessary to comply with the requirements of Rule 26(e) of the Federal Rules of Civil Procedure.

DEFINITIONS

The words and phrases used in these requests shall have the meanings ascribed to them under the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Northern District of California. In addition, the following terms shall have the meanings set forth below whenever used in any request.

1. The term “Affiliated Entity(ies)” means any entity(ies) involved in the production, pricing, marketing, distribution, and/or sale of CRTs or CRT Products (as those terms are defined herein) at any time during the Relevant Period (as defined herein) in which any of the Chunghwa Defendants (as defined herein), or any division, subdivision, business unit, parent, subsidiary, affiliate, or joint venture thereof, held any ownership interest at any time from March 1, 1995, to the present.

2. The words “all,” “any,” and “each” mean “each and every.”

3. The words “and” and “or” are both conjunctive and disjunctive as necessary.

4. The term “business expenses” includes any and all costs of doing business, including but not limited to any and all taxes, land acquisition costs, rent payments, insurance expenses, utility expenses (including but not limited to payments to vendors providing gas,

1 electric, water, trash disposal, internet, or phone services), office equipment purchases,
2 maintenance and repair expenses, office construction or remodeling expenses, legal
3 representation expenses, accounting expenses, and licensing or permit fees.

4 5. The words “communication” or “correspondence” or words of similar import, in the
5 singular or plural, mean and include without limitation any transmission of documents,
6 conversations, discussions, meetings, or other oral or written exchanges arising out of or
7 concerning the subject matter addressed.

8 6. The term “CRT” means cathode ray tube and includes cathode ray tubes used in
9 color televisions and color computer monitors.

10 7. The term “CRT Manufacturer” means any entity that manufactures CRTs.

11 8. The term “CRT Product” means a television or computer monitor containing a
12 CRT.

13 9. The term “CRT Product Manufacturer” means any entity that manufactures
14 products containing CRTs, including, but not limited to, original equipment manufacturers,
15 original design manufacturers, electronics manufacturing services, contract manufacturers,
16 and/or systems integrators.

17 10. “Document” means, without limitation, the following items, whether printed,
18 recorded, or reproduced by any other mechanical means or process, or written or produced by
19 hand: agreements; contracts; orders; purchase orders; communications; correspondence; letters;
20 emails; telegrams; tape recordings; memoranda; summaries; notes or other recordings of
21 telephone conversations, personal conversations, or meetings; agenda of meetings; notices;
22 minutes; records; calendars; daily diaries; daytimers; statistics; interoffice memoranda; personal
23 memoranda; photographs; photographic slides; motion picture films; audio tapes; charts; graphs;
24 diagrams; drawings; bookkeeping entries; bills; invoices; orders; receipts; canceled checks;
25 vouchers; ledger sheets; computer printouts; statements of witnesses; findings of investigations;
26 files; records of negotiations; reports of experts; reports of consultants; papers; books; bulletins;
27 publications; telefaxes; facsimiles; worksheets; securities; order tickets; records; objects; video
28 tapes; maps; posters; pamphlets; flyers; and any and every other writing or other graphic means

1 by which human intelligence is in any way transmitted or reported. This includes all drafts,
2 alterations, modifications, changes, and amendments of any of the foregoing of which you have
3 knowledge or which are now or were formerly in your actual or constructive possession, custody,
4 or control. A draft or non-identical copy is a separate document within the meaning of this term.

5 11. "Identify," when used with reference to an entity, means to state the full name,
6 present or last known address, and present or last known telephone number of such entity.

7 12. "Identify," when used with reference to documents, other than those under claim
8 of privilege, means to identify the documents by each author, sender, addressee, date, subject,
9 recipient, place of recording, and custodian.

10 13. "Identify" or "identification," when used in reference to an individual person,
11 means to state his or her full name, present or last known address, present or last known
12 telephone number, and present or last known position and business affiliation.

13 14. "Identify," "describe," "explain," or "state," when used in reference to any fact,
14 act occurrence, transaction, statement, communication, document, or other matter, means to
15 describe and identify the facts constituting such matter.

16 15. "Including" or "includes" means without limitation.

17 16. "Reflect(ing) or refer(ring) to" means a statement or communication about,
18 relating to, concerning, describing, containing, identifying, or in any way pertaining to the
19 subject matter in the request.

20 17. The term "Relevant Period" means the period beginning March 1, 1995 and
21 continuing through the present.

22 18. The terms "You" and "Your" mean the Chunghwa Defendants and/or each of the
23 Chunghwa Defendants, as defined herein.

24 19. The term "Chunghwa Defendants" refers collectively to Chunghwa Picture Tubes,
25 Ltd. and Chunghwa Picture Tubes (Malaysia), and their predecessors, parents, subsidiaries, or
26 affiliates and segments, departments, or divisions thereof.

INSTRUCTIONS

1
2 1. The documents covered by these requests include all documents in your
3 possession, custody, or control.

4 2. Each document request shall be construed independently, and no document
5 request shall be viewed as limiting the scope of any other document request.

6 3. Each document request seeks information limited to the Relevant Period, unless
7 stated otherwise.

8 4. You shall produce all documents in the manner in which they are maintained in
9 the usual course of Your business and/or You shall organize and label the documents to
10 correspond to the categories of the requests. A request for a document shall be deemed to
11 include a request for any and all file folders within which the document was contained,
12 transmittal sheets, cover letters, exhibits, attachments, or enclosures to the document in addition
13 to the document itself.

14 5. The fact that a document is produced by another party does not relieve you of the
15 obligation to produce your copy of the same document, even if the two documents are identical.

16 6. If you withhold under any claim of privilege any document or thing or portion
17 thereof requested, then furnish a list specifying each document or thing or part thereof for which
18 the privilege is claimed and the following information about each such item: date, author,
19 recipients and their titles; basis on which the privilege is claimed; the paragraph or sub-paragraph
20 of the request to which the document or thing responds; and a sufficient description of the
21 subject matter of the document or thing (without disclosing its contents) to allow its description
22 to the Court for a ruling on the claim of privilege.

23 7. If any information requested is withheld based on a claim that such information
24 constitutes attorney work-product, please provide all the information described in the previous
25 instruction and identify the litigation in connection with which the information and the
26 information it contains was obtained and/or prepared.

27 8. For each document request with respect to which you assert a claim of privilege,
28 state whether the documents or information requested have ever been provided to the

1 Government or any party, entity, or individual other than the Chunghwa Defendants or their
2 attorneys.

3 9. If any responsive document was but is no longer in your possession or subject to
4 your control, state whether it is: (a) missing or lost; (b) destroyed; (c) otherwise disposed of; or
5 (d) transferred voluntarily or involuntarily to others, and identify the name and address of its
6 current or last known custodian, and the circumstances surrounding such disposition.

7 10. The obligation to respond to these document requests is continuing pursuant to
8 Rule 26(e) of the Federal Rules of Civil Procedure. If at any time after responding to these
9 document requests you discover additional responsive documents that will make your responses
10 to these document requests more complete or correct, amend your responses and produce such
11 responsive documents as soon as reasonably possible, pursuant to the requirements of Rule
12 26(e).

13 11. If an objection is made to a request, or a part of a request, the specific ground for
14 the objection shall be set forth clearly in the response to that request. If you consider only a part
15 of a request to be objectionable, you must specify such part, and must otherwise respond to the
16 remainder of the request.

REQUESTS FOR PRODUCTION**REQUEST NO. 30:**

All Documents relating to, prepared for, submitted to, or received from any foreign governmental or legislative body, including the Canadian Competition Bureau, the European Commission, any agency or representative body of any foreign country, state or other political subdivision, or any law enforcement agency, authority or commission in any foreign country, relating to the production, sale, marketing, pricing or distribution of CRT or CRT Products. This request includes all Documents relating to proffers, transcripts, notes, summaries, testimony, witness statements, or responses to requests for information that You produced to any foreign governmental agency or foreign grand jury, including any Documents produced as part of any plea bargain negotiations or in connection with any application for or grant of amnesty.

1 DATED: January 30, 2014

/s/ Philip J. Iovieno

2 William A. Isaacson
3 BOIES, SCHILLER & FLEXNER LLP
4 5301 Wisconsin Ave. NW, Suite 800
5 Washington, D.C. 20015
6 Telephone: (202) 237-2727
7 Facsimile: (202) 237-6131
8 Email: wisaacson@bsfllp.com

9 Stuart Singer
10 BOIES, SCHILLER & FLEXNER LLP
11 401 East Las Olas Blvd., Suite 1200
12 Fort Lauderdale, FL 33301
13 Telephone: (954) 356-0011
14 Facsimile: (954) 356-0022
15 Email: ssinger@bsfllp.com

16 Philip J. Iovieno
17 Anne M. Nardacci
18 BOIES, SCHILLER & FLEXNER LLP
19 30 South Pearl Street, 11th Floor
20 Albany, NY 12207
21 Telephone: (518) 434-0600
22 Facsimile: (518) 434-0665
23 Email: piovieno@bsfllp.com
24 Email: anardacci@bsfllp.com

25 *Liaison Counsel for Direct Action Plaintiffs and*
26 *Attorneys for Plaintiffs Office Depot, Inc., Compucom*
27 *Systems, Inc., Interbond Corporation of America, P.C.*
28 *Richard & Son Long Island Corporation, MARTA*
Cooperative of America, Inc., ABC Appliance, Inc.,
Schultze Agency Services LLC on behalf of Tweeter
Opco, LLC and Tweeter Newco, LLC

19 /s/ David Martinez

20 Roman M. Silberfeld
21 David Martinez
22 Jill S. Casselman
23 ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
24 2049 Century Park East, Suite 3400
25 Los Angeles, CA 90067-3208
26 Telephone: (310) 552-0130
27 Facsimile: (310) 229-5800
28 Email: rmsilberfeld@rkmc.com
dmartinez@rkmc.com
jscasselman@rkmc.com

Elliot S. Kaplan
K. Craig Wildfang
Laura E. Nelson
ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
800 LaSalle Avenue

2800 LaSalle Plaza
Minneapolis, MN 55402
Telephone: (612) 349-8500
Facsimile: (612) 339-4181
Email: eskaplan@rkmc.com
kcwildfang@rkmc.com
lenelson@rkmc.com

*Counsel for Plaintiffs Best Buy Co., Inc., Best Buy
Purchasing LLC, Best Buy Enterprise Services, Inc.,
Best Buy Stores, L.P., BestBuy.com, L.L.C., and
Magnolia Hi-Fi, LLC*

/s/ William J. Blechman

Richard Alan Arnold
William J. Blechman
Kevin J. Murray
KENNY NACHWALTER, P.A.
201 S. Biscayne Boulevard, Suite 1100
Miami, FL 33131
Telephone: (305) 373-1000
Facsimile: (305) 372-1861
Email: rarnold@knpa.com
wblechman@knpa.com
kmurray@knpa.com

*Counsel for Plaintiff Sears Roebuck and Co. and
Kmart Corp.*

/s/ Jason C. Murray

Jason C. Murray
CROWELL & MORING LLP
515 South Flower Street, 40th Floor
Los Angeles, CA 90071
Telephone: (213) 443-5582
Facsimile: (213) 622-2690
Email: jmurray@crowell.com

Jerome A. Murphy
Astor H.L. Heaven
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: (202) 624-2500
Facsimile: (202) 628-5116
Email: jmurphy@crowell.com
aheaven@crowell.com

Counsel for Target Corp.

/s/ Scott N. Wagner

Robert W. Turken
Scott N. Wagner
Mitchell E. Widom
BILZIN SUMBERG BAENA PRICE & AXELROD
LLP
1450 Brickell Ave, Suite 2300
Miami, FL 33131-3456
Tel: 305-374-7580
Fax: 305-374-7593
Email: rturken@bilzin.com
Email: swagner@bilzin.com
mwidom@bilzin.com

Stuart Singer
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
Telephone: (954) 356-0011
Facsimile: (954) 356-0022
Email: ssinger@bsflp.com

*Attorneys for Plaintiffs Tech Data Corporation and
Tech Data Product Management, Inc.*

EXHIBIT 5

GIBSON, DUNN & CRUTCHER LLP
JOEL S. SANDERS, SBN 107234
jsanders@gibsondunn.com
RACHEL S. BRASS, SBN 219301
rbrass@gibsondunn.com
AUSTIN SCHWING, SBN 211696
ASCHWING@GIBSONDUNN.COM
555 Mission Street, Suite 3000
San Francisco, CA 94105
Telephone: (415) 393-8200
Facsimile: (415) 986-5309

Attorneys for Defendant
CHUNGHWA PICTURE TUBES, LTD.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re Cathode Ray Tube (CRT) ANTITRUST
LITIGATION

Master File No. 3:07-md-05944 SC
MDL No. 1917

This Document Relates To:

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
No. 11-cv-05513;

*Target Corp, et al. v. Chunghwa Picture
Tubes, Ltd., et al.*, No. 11-cv-05514;

*Interbond Corporation of America v. Hitachi,
et al.*, No. 11-cv-06275;

Office Depot, Inc. v. Hitachi Ltd., et al.,
No. 11-cv-06276;

*CompuCom Systems, Inc. v. Hitachi, Ltd.,
et al.*, No. 11-cv-06396;

*P.C. Richard & Son Long Island Corporation,
et al. v. Hitachi, Ltd., et al.*, No. 12-cv-02648;

*Schultze Agency Services, LLC, et al. v.
Hitachi, Ltd., et al.*, No. 12-cv-02649;

*Tech Data Corporation, et al. v. Hitachi, Ltd.,
et al.*, No. 12-cv-02795-JSM-MAP (M.D. Fla.)

**CHUNGHWA PICTURE TUBES, LTD.
AND CHUNGHWA PICTURE TUBES
(MALAYSIA)'S RESPONSES TO DIRECT
ACTION PLAINTIFFS' SECOND SET OF
REQUESTS FOR PRODUCTION**

1 PROPOUNDING PARTIES: Direct Action Plaintiffs

2 RESPONDING PARTY: Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes
(Malaysia)

3 SET: Two

4 Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendants Chunghwa Picture
5 Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia) (collectively "CPT") provide the following
6 responses to Direct Action Plaintiffs Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy
7 Enterprise Services, Inc., Best Buy Stores, L.P., Bestbuy.com, L.L.C., and Magnolia Hi-Fi, Inc.;
8 Target Corp., Sears, Roebuck, and Co., Kmart Corp.; Interbond Corporation of America; Office
9 Depot, Inc.; CompuCom Systems, Inc.; P.C. Richard & Son Long Island Corporation, MARTA
10 Cooperative of America, Inc., and ABC Appliance, Inc.; Schultze Agency Services, LLC on behalf of
11 Tweeter Opco, LLC and Tweeter Newco, LLC; Tech Data Corporation and Tech Data Product
12 Management, Inc.'s (collectively, "Plaintiffs") Second Set of Requests for Production ("Requests"),
13 dated January 30, 2014.

14 **PRELIMINARY STATEMENT**

15 The following responses are based on CPT's knowledge, information and belief at this time
16 and are complete as to CPT's best knowledge at this time. Furthermore, these responses were
17 prepared based on CPT's good faith interpretation and understanding of the Requests and are subject
18 to correction for inadvertent errors or omissions, if any.

19 CPT reserves the right to refer to, conduct discovery with reference to, or to offer into
20 evidence at the time of trial, any and all facts, evidence, documents and things developed during the
21 course of discovery and trial preparation, notwithstanding the reference to facts, evidence, documents
22 and things in these responses. In addition, CPT assumes no obligation to voluntarily supplement or
23 amend these responses to reflect information, evidence, documents or things discovered following
24 service of these responses. Nevertheless, these responses are given without prejudice to subsequent
25 revision or supplementation, including objections, based upon any information, evidence and
26 documentation, which hereinafter may be discovered.

GENERAL OBJECTIONS & RESPONSES

CPT incorporates the following General Objections and Responses into the specific responses set forth below. CPT does not waive any of these General Objections in its responses to the specific Request propounded. Any specific objection made by CPT in no respect limits or modifies these General Objections.

1. CPT objects generally to Plaintiffs' Request to the extent it seeks to impose obligations beyond those imposed by the Federal Rules of Civil Procedure, the Local Rules for the Northern District of California, or any rules and orders of the Court.

2. CPT objects generally to Plaintiffs' Request to the extent that it seeks disclosure of information subject to the attorney-client privilege, attorney work product doctrine, joint defense privilege, or any other applicable privilege or protection available under any and all applicable laws. Any inadvertent disclosure of privileged information shall not constitute a waiving any otherwise valid claim of privilege, and any failure to assert a privilege as to one document or communication shall not be deemed to constitute a waiving the privilege as to any other document or communication so protected.

3. CPT objects generally to Plaintiffs' Request to the extent it seeks information not within CPT's possession, custody, or control.

4. CPT objects generally to Plaintiffs' Request on the grounds that it is "unreasonably cumulative or duplicative" and "the burden or expense of the proposed discovery outweighs its likely benefit." Fed. R. Civ. P. 26(b)(2).

5. CPT objects generally to Plaintiffs' Request to the extent it seeks information containing or relating to trade secrets, proprietary, or confidential information protected by constitutional, statutory or common law rights of privacy. *See, e.g.*, Cal. Const. art. I, § 1.

6. CPT objects generally to Plaintiffs' Request because, given its scope, preparing a substantive response is overly burdensome.

7. CPT objects generally to Plaintiffs' Request to the extent it seeks information that is not relevant to the claims or defenses of any party in this action.

8. CPT objects generally to Plaintiffs' Request, including the Definitions, to the extent they contain misstatements of fact or law or inaccurate assumptions. Nothing in these Responses shall be construed as constituting or implying an admission of any allegation or agreement with any assertion, assumption or characterization in Plaintiffs' Request.

9. CPT objects generally to Plaintiffs' Requests to the extent Plaintiffs purport to seek a separate response from Chunghwa Picture Tubes (Malaysia), which ceased to exist in 2011.

10. CPT objects to Plaintiffs' definition of the term "Chunghwa Defendants" which includes "any, predecessors, successors, parents, subsidiaries, affiliates, or any other person or entity acting on their behalf" because these definitions are vague, overly broad and unduly burdensome. Further, they include persons not controlled by CPT and seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and improperly purport to seek information from distinct corporate entities and persons not parties to the current action and not controlled by CPT. CPT construes "Chunghwa Defendants" (and correspondingly, the terms "You" and "Your") to refer to Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia).

11. CPT objects to Plaintiffs' definition of the term "Affiliated Entity(ies)," which purports to apply to "*any* entity(ies) involved in the production, pricing, marketing, distribution and/or sale of CRTs or CRT Products . . . at *any* time during the Relevant Period . . . in which *any* of the Chunghwa Defendants . . . or *any* division, subdivision, business unit, parent, subsidiary, affiliate, or joint venture thereof, held *any* ownership interest at any time from March 1, 1995 to the present," as vague, overbroad, and unduly burdensome.

12. CPT reserves all other objections, including but not limited to objections to the relevance, admissibility, or authenticity of all documents or information provided.

RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST NO. 30:

All Documents relating to, prepared for, submitted to, or received from any foreign governmental or legislative body, including the Canadian Competition Bureau, the European Commission, any agency or representative body of any foreign country, state or other political subdivision, or any law enforcement agency, authority or commission in any foreign country, relating

1 to the production, sale, marketing, pricing or distribution of CRT or CRT Products. This request
 2 includes all Documents relating to proffers, transcripts, notes, summaries, testimony, witness
 3 statements, or responses to requests for information that You produced to any foreign governmental
 4 agency or foreign grand jury, including any Documents produced as part of any plea bargain
 5 negotiations or in connection with any application for or grant of amnesty.

6 **RESPONSE TO REQUEST NO. 30:**

7 CPT incorporates the General Objections and Responses set forth above. CPT further objects
 8 that this Request is vague, unduly burdensome, overly broad, and seeks information that is neither
 9 relevant to any claim or defense of any party, nor reasonably calculated to lead to the discovery of
 10 admissible evidence. CPT further objects to this Request to the extent that it requests documents
 11 provided to or related to any foreign governmental investigation, as such investigations have no
 12 relevance to this litigation, and the Request therefore seeks information not relevant to the claim or
 13 defense of any party. In addition, CPT objects to this Request because it conflicts with the policies
 14 supporting grand jury secrecy (see, e.g., Fed.R.Crim.P. 6(e)), and the confidentiality of law
 15 enforcement investigations, as well as the public interest in avoiding interference and promoting
 16 cooperation with such investigations. CPT also objects to the extent that this request is inconsistent
 17 with the policies or interests of any foreign enforcement authority, or would require CPT to violate
 18 the laws or requirements of any foreign government or enforcement authority. Finally, CPT objects
 19 to this Request to the extent that it seeks documents that are protected from disclosure by the
 20 attorney-client privilege, attorney work product doctrine, or any other privilege.

21 CPT concurrently produces with these responses the public, final decisions issued by the
 22 Korean Fair Trade Commission (“KFTC”) and Anti-Monopoly Office of the Slovak Republic in
 23 connection with their color picture tubes and color display tubes investigations and contemporaneous
 24 business records produced to the KFTC.

1 DATED: March 4, 2014

2 GIBSON, DUNN & CRUTCHER LLP

3
4 By: Rachel S. Brass
Rachel S. Brass

5 Attorneys for Defendant
6 CHUNGHWA PICTURE TUBES, LTD.
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I, Christine Fujita, declare as follows:

I am employed in the County of San Francisco, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 555 Mission Street, Suite 3000, San Francisco, California 94105, in said County and State. On the date indicated below, I served the within:

CHUNGHWA PICTURE TUBES, LTD. AND CHUNGHWA PICTURE TUBES (MALAYSIA)'S RESPONSES TO DIRECT ACTION PLAINTIFFS' SECOND SET OF REQUESTS FOR PRODUCTION

to each of the persons named below, in the manner described below:

Roman M. Silberfeld
E-mail: RMSilberfeld@rkmc.com
David Martinez
E-mail: DMartinez@rkmc.com
Jill S. Casselman
E-mail: JSCasselman@rkmc.com
ROBINS, KAPLAN, MILLER & CIRESI
L.L.P.
2049 Century Park East, Suite 3400
Los Angeles, CA 90067-3208
Telephone: 310-552-0130
Facsimile: 310-229-5800

Counsel for Plaintiffs Best Buy Co., Inc.

Jason C. Murray
E-mail: jmmurray@crowell.com
CROWELL & MORING LLP
515 South Flower St., 40th Floor
Los Angeles, CA 90071
Telephone: 213-443-5582
Facsimile: 213-622-2690

Counsel for Plaintiff Target Corp.

Elliot S. Kaplan
E-mail: ESKaplan@rkmc.com
K. Craig Wildfang
E-mail: KCWildfang@rkmc.com
Laura E. Nelson
E-mail: LENelson@rkmc.com
ROBINS, KAPLAN, MILLER & CIRESI
L.L.P.
800 LaSalle Avenue
2800 LaSalle Plaza
Minneapolis, MN 55402
Telephone: 612-349-8500
Facsimile: 612-339-4181

Counsel for Plaintiffs Best Buy Co., Inc.

Jerome A. Murphy
E-mail: jmurphy@crowell.com
Astor H.L. Heaven
E-mail: aheaven@crowell.com
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: 202-624-2500
Facsimile: 202-628-5116

Counsel for Plaintiff Target Corp.

Stuart H. Singer
 Email: ssinger@bsflp.com
 BOIES, SCHILLER, & FLEXNER LLP
 401 East Las Olas Boulevard, Suite 1200
 Fort Lauderdale, Florida 33301
 Telephone: (954) 356-0011
 Facsimile: (954) 356-0022

Counsel for Plaintiffs Interbond Corporation of America; Office Depot, Inc; Tech Data Corporation and Tech Data Product Management, Inc.

Philip J. Iovieno (*Pro hac vice*)
 Email: piovieno@bsflp.com
 Anne M. Nardacci (*Pro hac vice*)
 Email: anardacci@bsflp.com
 BOIES, SCHILLER & FLEXNER LLP
 30 South Pearl Street, 11th Floor
 Albany, NY 12207
 Telephone: (518) 434-0600
 Facsimile: (518) 434-0665

Liaison Counsel for Direct Action Plaintiffs and Counsel for Plaintiffs Interbond Corporation of America; CompuCom Systems, Inc; P.C. Richard & Son Long Island Corporation, MARTA Cooperative of America, Inc., and ABC Appliance, Inc; Schultze Agency Services, LLC on behalf of Tweeter Opco, LLC and Tweeter Newco, LL

David J. Burman
 E-mail: dburman@perkinscoie.com
 Cori G. Moore
 E-mail: cgmoore@perkinscoie.com
 Eric J. Weiss
 E-mail: ewiess@perkinscoie.com
 Nicholas H. Hesterberg
 E-mail: nhesterberg@perkinscoie.com
 PERKINS COIE LLP
 1201 Third Avenue
 Suite 4900
 Seattle, WA 98101-3099
 Telephone: (206) 359-8000
 Facsimile: (202) 359-9000

Counsel for Costco Wholesale Corporation

William A. Isaacson
 Email: wisaacson@bsflp.com
 BOIES, SCHILLER & FLEXNER LLP
 5301 Wisconsin Ave. NW, Suite 800
 Washington, DC 20015
 Telephone: (202) 237-2727
 Facsimile: (202) 237-6131

Counsel for Plaintiffs Interbond Corporation of Americ; OfficeDepot, Inc.; CompuCom Systems, Inc.; P.C. Richard & Son Long Island Corporation, MARTA Cooperative of America, Inc., and ABC Appliance, Inc.; Schultze Agency Services, LLC on behalf of Tweeter Opco, LLC and Tweeter Newco, LLC

Mike Mckool, Jr.
 E-Mail: mmckool@mckoolsmith.com
 Lewis T. Leclair
 Scott R. Jacobs
 MCKOOL SMITH, P.C
 300 Crescent Court, Suite 1500
 Dallas, TX 75201
 Telephone: (214) 978-4000
 Facsimile: (214) 978-4044

Counsel for Plaintiff CompuCom Systems, Inc.

Joren S. Bass
 E-mail: jrbass@perkinscoie.com
 PERKINS COIE LLP
 Four Embarcadero Center
 Suite 2400
 San Francisco, CA 94111-4131
 Telephone: (415) 344-7120
 Facsimile: (415) 344-7320

Counsel for Costco Wholesale Corporation

Robert Turken
E-mail: rturken@bilzin.com
Mitchell E. Widom
E-mail: mwidom@bilzin.com
Scott N. Wagner (pro hac vice)
E-mail: swagner@bilzin.com

Wendy Polit
E-mail: wpolit@bilzin.com
BILZIN SUMBERG BAENA PRICE &
AXELROD LLP
200 South Biscayne Blvd
Suite 2500
Miami, FL 33131-5340
Telephone: (305) 350-2381
Facsimile: (305) 351-2262

*Counsel for Plaintiffs Tech Data Corporation
and Tech Data Product Management, Inc.*

Mario N. Alioto
E-mail: malioto@tntp.com
TRUMP, ALIOTO, TRUMP & PRESCOTT,
LLP

*Interim Lead Counsel for the Indirect
Purchaser Plaintiffs*

All Defense Counsel

Guido Saveri
E-mail: guido@saveri.com
SAVERI & SAVERI, INC.

*Interim Lead Counsel for the Direct
Purchaser Plaintiffs*

Emilio Varanini
E-mail: emilio.varanini@doj.ca.gov
STATE OF CALIFORNIA

Counsel for the State of California



BY ELECTRONIC MAIL: On the date shown below, a true copy PDF version of the above-referenced document was automatically e-mailed to the e-mail addresses of each party indicated on the service list.

I certify under penalty of perjury that the foregoing is true and correct, that the foregoing document was printed on recycled paper, and that this Certificate of Service was executed by me on March 4, 2014, at San Francisco, California.

/s/ Christine Fujita
Christine Fujita

EXHIBIT 6

GIBSON, DUNN & CRUTCHER LLP
JOEL S. SANDERS, SBN 107234
jsanders@gibsondunn.com
RACHEL S. BRASS, SBN 219301
rbrass@gibsondunn.com
AUSTIN SCHWING, SBN 211696
ASCHWING@GIBSONDUNN.COM
555 Mission Street, Suite 3000
San Francisco, CA 94105
Telephone: (415) 393-8200
Facsimile: (415) 986-5309

Attorneys for Defendant
CHUNGHWA PICTURE TUBES, LTD.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re Cathode Ray Tube (CRT) ANTITRUST
LITIGATION

Master File No. 3:07-md-05944 SC
MDL No. 1917

This Document Relates To:

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
No. 11-cv-05513;

*Target Corp, et al. v. Chunghwa Picture
Tubes, Ltd., et al.*, No. 11-cv-05514;

*Interbond Corporation of America v. Hitachi,
et al.*, No. 11-cv-06275;

Office Depot, Inc. v. Hitachi Ltd., et al.,
No. 11-cv-06276;

*CompuCom Systems, Inc. v. Hitachi, Ltd.,
et al.*, No. 11-cv-06396;

*P.C. Richard & Son Long Island Corporation,
et al. v. Hitachi, Ltd., et al.*, No. 12-cv-02648;

*Schultze Agency Services, LLC, et al. v.
Hitachi, Ltd., et al.*, No. 12-cv-02649;

*Tech Data Corporation, et al. v. Hitachi, Ltd.,
et al.*, No. 12-cv-02795-JSM-MAP (M.D. Fla.)

**CHUNGHWA PICTURE TUBES, LTD.
AND CHUNGHWA PICTURE TUBES
(MALAYSIA)'S SUPPLEMENTAL
RESPONSES TO DIRECT ACTION
PLAINTIFFS' SECOND SET OF
REQUESTS FOR PRODUCTION**

1 PROPOUNDING PARTIES: Direct Action Plaintiffs

2 RESPONDING PARTY: Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes
(Malaysia)

3 SET: Two

4 Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendants Chunghwa Picture
5 Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia) (collectively "CPT") provide the following
6 supplemental responses to Direct Action Plaintiffs Best Buy Co., Inc., Best Buy Purchasing LLC,
7 Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., Bestbuy.com, L.L.C., and Magnolia Hi-Fi,
8 Inc.; Target Corp., Sears, Roebuck, and Co., Kmart Corp.; Interbond Corporation of America; Office
9 Depot, Inc.; CompuCom Systems, Inc.; P.C. Richard & Son Long Island Corporation, MARTA
10 Cooperative of America, Inc., and ABC Appliance, Inc.; Schultze Agency Services, LLC on behalf of
11 Tweeter Opco, LLC and Tweeter Newco, LLC; Tech Data Corporation and Tech Data Product
12 Management, Inc.'s (collectively, "Plaintiffs") Second Set of Requests for Production ("Requests"),
13 dated January 30, 2014.

14 **PRELIMINARY STATEMENT**

15 The following responses are based on CPT's knowledge, information and belief at this time
16 and are complete as to CPT's best knowledge at this time. Furthermore, these responses were
17 prepared based on CPT's good faith interpretation and understanding of the Requests and are subject
18 to correction for inadvertent errors or omissions, if any.

19 CPT reserves the right to refer to, conduct discovery with reference to, or to offer into
20 evidence at the time of trial, any and all facts, evidence, documents and things developed during the
21 course of discovery and trial preparation, notwithstanding the reference to facts, evidence, documents
22 and things in these responses. In addition, CPT assumes no obligation to voluntarily supplement or
23 amend these responses to reflect information, evidence, documents or things discovered following
24 service of these responses. Nevertheless, these responses are given without prejudice to subsequent
25 revision or supplementation, including objections, based upon any information, evidence and
26 documentation, which hereinafter may be discovered.

SUPPLEMENTAL RESPONSES TO REQUESTS FOR PRODUCTION

CPT incorporates into the following supplemental responses the responses and objections contained in CPT's Responses and Objections to Direct Action Plaintiffs' Second Set of Requests for Production, served on March 4, 2014.

REQUEST NO. 30:

All Documents relating to, prepared for, submitted to, or received from any foreign governmental or legislative body, including the Canadian Competition Bureau, the European Commission, any agency or representative body of any foreign country, state or other political subdivision, or any law enforcement agency, authority or commission in any foreign country, relating to the production, sale, marketing, pricing or distribution of CRT or CRT Products. This request includes all Documents relating to proffers, transcripts, notes, summaries, testimony, witness statements, or responses to requests for information that You produced to any foreign governmental agency or foreign grand jury, including any Documents produced as part of any plea bargain negotiations or in connection with any application for or grant of amnesty.

RESPONSE TO REQUEST NO. 30:

CPT incorporates the General Objections and Responses set forth above. CPT further objects that this Request is vague, unduly burdensome, overly broad, and seeks information that is neither relevant to any claim or defense of any party, nor reasonably calculated to lead to the discovery of admissible evidence. CPT further objects to this Request to the extent that it requests documents provided to or related to any foreign governmental investigation, as such investigations have no relevance to this litigation, and the Request therefore seeks information not relevant to the claim or defense of any party. In addition, CPT objects to this Request because it conflicts with the policies supporting grand jury secrecy (see, e.g., Fed.R.Crim.P. 6(e)), and the confidentiality of law enforcement investigations, as well as the public interest in avoiding interference and promoting cooperation with such investigations. CPT also objects to the extent that this request is inconsistent with the policies or interests of any foreign enforcement authority, or would require CPT to violate the laws or requirements of any foreign government or enforcement authority. Finally, CPT objects

1 to this Request to the extent that it seeks documents that are protected from disclosure by the
2 attorney-client privilege, attorney work product doctrine, or any other privilege.

3 CPT concurrently produces with these responses the public, final decisions issued by the
4 Korean Fair Trade Commission (“KFTC”) and Anti-Monopoly Office of the Slovak Republic in
5 connection with their color picture tubes and color display tubes investigations and contemporaneous
6 business records produced to the KFTC.

7 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 30:**

8 CPT incorporates herein its prior response and objections to this request. Subject to and
9 without waiving the above response and objections, CPT supplements its response as follows:

10 CPT concurrently produces with these supplemental responses the public, final decision
11 issued by the Office for the Protection of Competition of the Czech Republic in connection with its
12 color picture tubes and color display tubes investigations and subsequent decisions relating to the
13 appeal of that decision.

14
15 DATED: March 11, 2014

16 GIBSON, DUNN & CRUTCHER LLP

17
18 By: Rachel S. Brass
Rachel S. Brass

19 Attorneys for Defendant
20 CHUNGHWA PICTURE TUBES, LTD.

CERTIFICATE OF SERVICE

I, Christine Fujita, declare as follows:

I am employed in the County of San Francisco, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 555 Mission Street, Suite 3000, San Francisco, California 94105, in said County and State. On the date indicated below, I served the within:

CHUNGHWA PICTURE TUBES, LTD. AND CHUNGHWA PICTURE TUBES (MALAYSIA)'S SUPPLEMENTAL RESPONSES TO DIRECT ACTION PLAINTIFFS' SECOND SET OF REQUESTS FOR PRODUCTION

to each of the persons named below, in the manner described below:

Roman M. Silberfeld
E-mail: RMSilberfeld@rkmc.com
David Martinez
E-mail: DMartinez@rkmc.com
Jill S. Casselman
E-mail: JSCasselman@rkmc.com
ROBINS, KAPLAN, MILLER & CIRESI
L.L.P.
2049 Century Park East, Suite 3400
Los Angeles, CA 90067-3208
Telephone: 310-552-0130
Facsimile: 310-229-5800

Counsel for Plaintiffs Best Buy Co., Inc.

Jason C. Murray
E-mail: jmmurray@crowell.com
CROWELL & MORING LLP
515 South Flower St., 40th Floor
Los Angeles, CA 90071
Telephone: 213-443-5582
Facsimile: 213-622-2690

Counsel for Plaintiff Target Corp.

Elliot S. Kaplan
E-mail: ESKaplan@rkmc.com
K. Craig Wildfang
E-mail: KCWildfang@rkmc.com
Laura E. Nelson
E-mail: LENelson@rkmc.com
ROBINS, KAPLAN, MILLER & CIRESI
L.L.P.
800 LaSalle Avenue
2800 LaSalle Plaza
Minneapolis, MN 55402
Telephone: 612-349-8500
Facsimile: 612-339-4181

Counsel for Plaintiffs Best Buy Co., Inc.

Jerome A. Murphy
E-mail: jmurphy@crowell.com
Astor H.L. Heaven
E-mail: aheaven@crowell.com
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: 202-624-2500
Facsimile: 202-628-5116

Counsel for Plaintiff Target Corp.

Stuart H. Singer
 Email: ssinger@bsflp.com
 BOIES, SCHILLER, & FLEXNER LLP
 401 East Las Olas Boulevard, Suite 1200
 Fort Lauderdale, Florida 33301
 Telephone: (954) 356-0011
 Facsimile: (954) 356-0022

Counsel for Plaintiffs Interbond Corporation of America; Office Depot, Inc; Tech Data Corporation and Tech Data Product Management, Inc.

Philip J. Iovieno (*Pro hac vice*)
 Email: piovieno@bsflp.com
 Anne M. Nardacci (*Pro hac vice*)
 Email: anardacci@bsflp.com
 BOIES, SCHILLER & FLEXNER LLP
 30 South Pearl Street, 11th Floor
 Albany, NY 12207
 Telephone: (518) 434-0600
 Facsimile: (518) 434-0665

Liaison Counsel for Direct Action Plaintiffs and Counsel for Plaintiffs Interbond Corporation of America; CompuCom Systems, Inc; P.C. Richard & Son Long Island Corporation, MARTA Cooperative of America, Inc., and ABC Appliance, Inc; Schultze Agency Services, LLC on behalf of Tweeter Opco, LLC and Tweeter Newco, LL

David J. Burman
 E-mail: dburman@perkinscoie.com
 Cori G. Moore
 E-mail: cgmoore@perkinscoie.com
 Eric J. Weiss
 E-mail: ewiess@perkinscoie.com
 Nicholas H. Hesterberg
 E-mail: nhesterberg@perkinscoie.com
 PERKINS COIE LLP
 1201 Third Avenue
 Suite 4900
 Seattle, WA 98101-3099
 Telephone: (206) 359-8000
 Facsimile: (202) 359-9000

Counsel for Costco Wholesale Corporation

William A. Isaacson
 Email: wisaacson@bsflp.com
 BOIES, SCHILLER & FLEXNER LLP
 5301 Wisconsin Ave. NW, Suite 800
 Washington, DC 20015
 Telephone: (202) 237-2727
 Facsimile: (202) 237-6131

Counsel for Plaintiffs Interbond Corporation of Americ; OfficeDepot, Inc.; CompuCom Systems, Inc.; P.C. Richard & Son Long Island Corporation, MARTA Cooperative of America, Inc., and ABC Appliance, Inc.; Schultze Agency Services, LLC on behalf of Tweeter Opco, LLC and Tweeter Newco, LLC

Mike Mckool, Jr.
 E-Mail: mmckool@mckoolsmith.com
 Lewis T. Leclair
 Scott R. Jacobs
 MCKOOL SMITH, P.C
 300 Crescent Court, Suite 1500
 Dallas, TX 75201
 Telephone: (214) 978-4000
 Facsimile: (214) 978-4044

Counsel for Plaintiff CompuCom Systems, Inc.

Joren S. Bass
 E-mail: jrbass@perkinscoie.com
 PERKINS COIE LLP
 Four Embarcadero Center
 Suite 2400
 San Francisco, CA 94111-4131
 Telephone: (415) 344-7120
 Facsimile: (415) 344-7320

Counsel for Costco Wholesale Corporation

Robert Turken
E-mail: rturken@bilzin.com
Mitchell E. Widom
E-mail: mwidom@bilzin.com
Scott N. Wagner (pro hac vice)
E-mail: swagner@bilzin.com

Wendy Polit
E-mail: wpolit@bilzin.com
BILZIN SUMBERG BAENA PRICE &
AXELROD LLP
200 South Biscayne Blvd
Suite 2500
Miami, FL 33131-5340
Telephone: (305) 350-2381
Facsimile: (305) 351-2262

*Counsel for Plaintiffs Tech Data Corporation
and Tech Data Product Management, Inc.*

Mario N. Alioto
E-mail: malioto@tntp.com
TRUMP, ALIOTO, TRUMP & PRESCOTT,
LLP

*Interim Lead Counsel for the Indirect
Purchaser Plaintiffs*

All Defense Counsel

Guido Saveri
E-mail: guido@saveri.com
SAVERI & SAVERI, INC.

*Interim Lead Counsel for the Direct
Purchaser Plaintiffs*

Emilio Varanini
E-mail: emilio.varanini@doj.ca.gov
STATE OF CALIFORNIA

Counsel for the State of California



BY ELECTRONIC MAIL: On the date shown below, a true copy PDF version of the above-referenced document was automatically e-mailed to the e-mail addresses of each party indicated on the service list.

I certify under penalty of perjury that the foregoing is true and correct, that the foregoing document was printed on recycled paper, and that this Certificate of Service was executed by me on March 11, 2014, at San Francisco, California.

/s/ Christine Fujita
Christine Fujita

EXHIBIT 7

1 ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
 Roman M. Silberfeld, Bar No. 62783
 2 RMSilberfeld@rkmc.com
 Bernice Conn, Bar No. 161594
 3 Bconn@rkmc.com
 David Martinez, Bar No. 193183
 4 DMartinez@rkmc.com
 2049 Century Park East, Suite 3400
 5 Los Angeles, CA 90067-3208
 Telephone: 310-552-0130
 6 Facsimile: 310-229-5800

7 Attorneys for Plaintiffs

8 BEST BUY CO., INC.; BEST BUY
 PURCHASING LLC; BEST BUY ENTERPRISE
 9 SERVICES, INC.; BEST BUY STORES, L.P.;
 BESTBUY.COM, LLC; MAGNOLIA HI-FI, LLC

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

13 IN RE: CATHODE RAY TUBE (CRT)
 14 ANTITRUST LITIGATION

Master File No. M:07-5994-SC
 MDL No. 1917

15 This Document Relates to

Case No. 3:11-cv-05513-SC

16 *Electrograph Systems, Inc. et al. v. Hitachi, Ltd.,*
et al., No. 11-cv-01656;

17 *Siegel v. Hitachi, Ltd., et al., No. 11-cv-05502;*

18 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,*
No. 11-cv-05513;

19 *Target Corp., et al. v. Chunghwa Picture Tubes,*
 20 *Ltd., et al., No. 11-cv-05514;*

21 *Interbond Corporation of America v. Hitachi, et*
al., No. 11-cv-06275;

22 *Office Depot, Inc. v. Hitachi, Ltd., et al., No.*
 23 *11-cv-06276;*

24 *CompuCom Systems, Inc. v. Hitachi, Ltd. et al.,*
No. 11-cv-06396;

25 *Costco Wholesale Corporation v. Hitachi, Ltd., et*
 26 *al., No. 11-cv-06397;*

27 *P.C. Richard & Son Long Island Corporation, et*
 28 *al. v. Hitachi, Ltd., et al., No. 12-cv-02648;*

**DIRECT ACTION PLAINTIFFS'
 AND INDIRECT ACTION
 PLAINTIFFS' FIRST SET OF
 REQUESTS FOR ADMISSION TO
 CHUNGHWA PICTURE TUBES,
 LTD. AND CHUNGHWA PICTURE
 TUBES (MALAYSIA)**

1 *Schultze Agency Services, LLC v. Hitachi, Ltd.,*
2 *et al., No. 12-cv-02649;*

3 *Tech Data Corporation, et al. v. Hitachi, Ltd., et*
4 *al., No. 13-cv-00157;*

5 *Sharp Electronics Corp., et al. v. Hitachi, Ltd., et*
6 *al., No. 13-cv-01173;*

7 *Dell Inc. and Dell Products L.P. v. Hitachi, Ltd.,*
8 *et al., No. 13-cv-02171;*

9 *Sharp Electronics Corp. et al. v. Koninklijke*
10 *Philips Electronics, N.V., et al., No. 13-cv-*
11 *02776;*

12 *Siegel v. Technicolor SA, et al., No. 13-cv-05261;*

13 *Sears, Roebuck and Co., et al. v. Technicolor SA,*
14 *No. 13-cv-05262;*

15 *Best Buy Co., Inc., et al. v. Technicolor SA, et al.,*
16 *No. 13-cv-05264;*

17 *Schultze Agency Services, LLC v. Technicolor*
18 *SA, et al., No. 13-cv-05668;*

19 *Target Corp., v. Technicolor SA, et al., No. 13-*
20 *cv-05686;*

21 *Costco Wholesale Corporation v. Technicolor*
22 *SA,, et al., No. 13-cv-005723;*

23 *Electrograph Systems, Inc., et al. v. Technicolor*
24 *SA, et al., No. 13-cv-05724;*

25 *P.C. Richard & Son Long Island Corporation, et*
26 *al. v. Technicolor SA, et al., No. 13-cv-05725;*

27 *Office Depot, Inc. v. Technicolor SA, et al., No.*
28 *13-cv-05726;*

Interbond Corporation of America v. Technicolor
SA, et al., No. 13-cv-05727.

ViewSonic Corporation, v. Chunghwa Picture
Tubes, Ltd., et al., 3:14cv-02510;

The Indirect Purchaser Action.

PROPOUNDING PARTIES:

Direct Action Plaintiffs Electrograph Systems, Inc.
and Electrograph Technologies Corp.; Alfred H.
Siegel, solely as Trustee of the Circuit City Stores,
Inc. Liquidating Trust; Best Buy Co., Inc., Best Buy
Purchasing LLC, Best Buy Enterprise Services,

Inc., Best Buy Stores, L.P., Bestbuy.com, L.L.C., and Magnolia Hi-Fi, LLC; Target Corp., Sears, Roebuck, and Co., Kmart Corp.; Interbond Corporation of America; Office Depot, Inc.; CompuCom Systems, Inc.; Costco Wholesale Corporation; P.C. Richard & Son Long Island Corporation, MARTA Cooperative of America, Inc., and ABC Appliance, Inc.; Schultz Agency Services, LLC on behalf of Tweeter Opco, LLC and Tweeter Newco, LLC; and Tech Data Corporation and Tech Data Product Management, Inc.; Dell Inc. and Dell Products L.P.; and Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.; and Viewsonic Corporation; and the Indirect Purchaser Plaintiffs

RESPONDING PARTY: Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia)

SET NO.: Authentication Set

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Best Buy hereby requests that Defendants serve responses to the following first set of requests for admission (the "Requests") in compliance with Rule 36 of the Federal Rules of Civil Procedure no later than thirty (30) days after the date of the service hereof.

DEFINITIONS

1. The terms "YOU" and "YOUR" shall mean the Responding Party above, and/or its agents, employees, attorneys and ALL other persons acting or purporting to act on its behalf at ANY time, and ALL associated or affiliated persons, companies, entities, subsidiaries, divisions, representatives, officers, investigators, accountants, predecessors and/or successors.

INSTRUCTIONS

1. Unless otherwise specified, no request for admission shall be viewed as limiting the scope of any other request for admission.

2. Each request for admission shall be numbered separately and each response shall be numbered in the same manner and sequence as the corresponding request for

admission.

3. If YOU do not have personal knowledge sufficient to fully respond to a request for admission, YOU should so state, and make a reasonable and good-faith effort to obtain the information by inquiring to other persons, organizations or natural persons.

4. These requests for admission are continuing in nature and YOU have a continuing obligation to update YOUR responses to these requests for admission so long as the action is pending.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Separately for each document identified in Exhibit A, Admit that the document is a true, correct and genuine copy of the original.

REQUEST FOR ADMISSION NO. 2:

Separately for each document identified in Exhibit A, Admit that the document is authentic and satisfies Fed. R. Evid. 901.

REQUEST FOR ADMISSION NO. 3:

Separately for each document identified in Exhibit A, Admit that the document was made at or near the time of the event reflected in the document.

REQUEST FOR ADMISSION NO. 4:

Separately for each document identify in Exhibit A, Admit that the document was made by someone with knowledge of the contents or event reflected in the document.

REQUEST FOR ADMISSION NO. 5:

Separately for each document identified in Exhibit A, Admit that the document was kept in the course of Your regularly conducted business.

REQUEST FOR ADMISSION NO. 6:

Separately for each document identified in Exhibit A, Admit that the document was prepared in the regular course of Your business.

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

REQUEST FOR ADMISSION NO. 7:

Separately for each document identified in Exhibit A, Admit that the document satisfies Fed. R. Evid. 803(6).

DATED: August 1, 2014

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

By: /s/ Laura E. Nelson
Roman M. Silberfeld
David Martinez
Laura E. Nelson

Attorneys for Plaintiffs Best Buy Co., Inc.; Best Buy Purchasing LLC; Best Buy Enterprise Services, Inc.; Best Buy Stores, L.P.; BESTBUY.COM, LLC; Magnolia Hi-Fi, LLC

/s/ Philip J. Iovieno
Philip J. Iovieno
Anne M. Nardacci
BOIES, SCHILLER & FLEXNER LLP
30 South Pearl Street, 11th Floor
Albany, NY 12207
Telephone: (518) 434-0600
Facsimile: (518) 434-0665
Email: piovieno@bsflp.com
Email: anardacci@bsflp.com

William A. Isaacson
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Ave. NW, Suite 800
Washington, D.C. 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131
Email: wisaacson@bsflp.com

Stuart Singer
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
Telephone: (954) 356-0011

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

Facsimile: (954) 356-0022
Email: ssinger@bsflp.com
*Liaison Counsel for Direct Action and Attorneys for
Plaintiffs Electrograph Systems, Inc., Electrograph
Technologies, Corp., Office Depot, Inc., Interbond
Corporation of America, P.C. Richard & Son Long Island
Corporation, MARTA Cooperative of America, Inc., ABC
Appliance, Inc., Schultze Agency Services LLC on behalf
of Tweeter Opco, LLC and Tweeter Newco, LLC
Liaison Counsel for Direct Action Plaintiffs*

/s/ David J. Burman

David J. Burman (pro hac vice)
Cori G. Moore (pro hac vice)
Eric J. Weiss (pro hac vice)
Nicholas H. Hesterberg (pro hac vice)
Steven D. Merriman (pro hac vice)
Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000
Email: DBurman@perkinscoie.com
Email: CGMoore@perkinscoie.com
Email: EWeiss@perkinscoie.com
Email: NHesterberg@perkinscoie.com
Email: SMerriman@perkinscoie.com

Joren Bass, Bar No. 208143
JBass@perkinscoie.com
Perkins Coie LLP
Four Embarcadero Center, Suite 2400
San Francisco, CA 94111-4131
Telephone: 415.344.7120
Facsimile: 415.344.7320
Attorneys for Plaintiff Costco Wholesale Corporation

/s/ Robert W. Turken

Robert W. Turken
Scott N. Wagner
Bilzin Sumberg Baena Price & Axelrod LLP
1450 Brickell Ave, Suite 2300
Miami, FL 33131-3456
Tel: 305-374-7580
Fax: 305-374-7593
Email: rturken@bilzin.com
Email: swagner@bilzin.com

Stuart Singer
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Blvd., Suite 1200

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

Fort Lauderdale, FL 33301
Telephone: (954) 356-0011
Facsimile: (954) 356-0022
Email: ssinger@bsflfp.com

William A. Isaacson
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Ave. NW, Suite 800
Washington, D.C. 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131
Email: wisaacson@bsflfp.com

Philip J. Iovieno
Anne M. Nardacci
BOIES, SCHILLER & FLEXNER LLP
30 South Pearl Street, 11th Floor
Albany, NY 12207
Telephone: (518) 434-0600
Facsimile: (518) 434-0665
Email: piovieno@bsflfp.com
Email: anardacci@bsflfp.com
*Attorneys for Plaintiffs Tech Data Corporation and Tech
Data Product Management, Inc.*

/s/ Kenneth S. Marks

Kenneth S. Marks
Jonathan J. Ross
Johnny W. Carter
David M. Peterson
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, Texas 77002
Telephone: (713) 651-9366
Facsimile: (713) 654-6666
Email: kmarks@susmangodfrey.com
Email: jross@susmangodfrey.com
Email: jcarter@susmangodfrey.com
Email: dpeterson@susmangodfrey.com

Parker C. Folse III
Rachel S. Black
Jordan Connors
SUSMAN GODFREY L.L.P.
1201 Third Avenue, Suite 3800
Seattle, Washington 98101-3000
Telephone: (206) 516-3880
Facsimile: (206) 516-3883
Email: pfolse@susmangodfrey.com
Email: rblack@susmangodfrey.com
Email: jconnors@susmangodfrey.com

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

*Attorneys for Plaintiff Alfred H. Siegel, as Trustee of the
Circuit City Stores, Inc. Liquidating Trust*

/s/ Jason C. Murray

Jason C. Murray (CA Bar No. 169806)

CROWELL & MORING LLP

515 South Flower St., 40th Floor

Los Angeles, CA 90071

Telephone: 213-443-5582

Facsimile: 213-622-2690

Email: jmurray@crowell.com

Jerome A. Murphy (pro hac vice)

Astor H.L. Heaven (pro hac vice)

CROWELL & MORING LLP

1001 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

Telephone: 202-624-2500

Facsimile: 202-628-5116

E-mail: jmurphy@crowell.com

aheaven@crowell.com

Attorneys for Target Corp. and ViewSonic Corporation

/s/ Richard Alan Arnold

Richard Alan Arnold

William J. Blechman

Kevin J. Murray

KENNY NACHWALTER, P.A.

201 S. Biscayne Blvd., Suite 1100

Miami, FL 33131

Tel: 305-373-1000

Fax: 305-372-1861

Email: rarnold@knpa.com

Email: wblechman@knpa.com

Email: kmurray@knpa.com

*Attorneys for Plaintiff Sears, Roebuck and Co. and Kmart
Corp*

/s/ Michael P. Kenny

Michael P. Kenny

Debra D. Bernstein

Matthew D. Kent

ALSTON & BIRD LLP

1201 West Peachtree Street

Atlanta, Georgia 30309-3424

Tel: (404) 881-7000

Facsimile: (404) 881-7777

Email: mike.kenny@alston.com

debra.bernstein@alston.com

matthew.kent@alston.com

James M. Wagstaffe, Esq. (SBN 95535)

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

KERR & WAGSTAFFE LLP
100 Spear Street, 18th Floor
San Francisco, California 94105-1576
Tel: (415) 371-8500
Facsimile: (415) 371-0500
Email: wagstaffe@kerrwagstaffe.com
*Counsel for Plaintiffs Dell Inc. and Dell
Products L.P.*

/s/ Kenneth A. Gallo

Kenneth A. Gallo (pro hac vice)
Joseph J. Simons (pro hac vice)
Craig A. Benson (pro hac vice)
PAUL, WEISS, RIFKIND, WHARTON & GARRISON
LLP
2001 K Street, NW
Washington, DC 20006
Telephone: (202) 223-7300
Facsimile: (202) 223-7420
kgallo@paulweiss.com
jsimons@paulweiss.com
cbenson@paulweiss.com

Stephen E. Taylor (SBN 058452)
Jonathan A. Patchen (SBN 237346)
TAYLOR & COMPANY LAW OFFICES, LLP
One Ferry Building, Suite 355
San Francisco, California 94111
Telephone: (415) 788-8200
Facsimile: (415) 788-8208
Email: staylor@tcolaw.com
Email: jpatchen@tcolaw.com
*Attorneys for Plaintiffs Sharp Electronics Corporation
and Sharp Electronics Manufacturing Company of
America, Inc.*

/s/ Lauren C. Russell

Lauren C. Russell
TRUMP ALIOTO TRUMP & PRESCOTT
ATTORNEYS LLP
2280 Union Street
San Francisco, CA 94123
Telephone: 415.563.7200
Fax: 415.346.0679
*Lead Counsel for the Indirect
Purchaser Plaintiffs*

EXHIBIT “A”

**EXHIBIT A TO THE DAPS' AND IPPS' FIRST SET OF REQUESTS FOR ADMISSION TO
CHUNGHWA PICTURE TUBES**

1.	CHU00000001	CHU00000146
2.	CHU00000207	CHU00000259
3.	CHU00000260	CHU00000304
4.	CHU00000305	CHU00000359
5.	CHU00000360	CHU00000410
6.	CHU00000411	CHU00000472
7.	CHU00000532	CHU00000578
8.	CHU00000642	CHU00000687
9.	CHU00000688	CHU00000737
10.	CHU00000738	CHU00000781
11.	CHU00000782	CHU00000827
12.	CHU00000828	CHU00000874
13.	CHU00000875	CHU00000923
14.	CHU00001031	CHU00001086
15.	CHU00001275	CHU00001291
16.	CHU00001348	CHU00001369
17.	CHU00001427	CHU00001441
18.	CHU0000207	CHU0000259
19.	CHU00002853	CHU00003107
20.	CHU000030912.01	CHU000030912.11
21.	CHU00003139	CHU00003155
22.	CHU00004334	CHU00005247
23.	CHU00005864	CHU00006620
24.	CHU00005963.01	CHU00005963.03
25.	CHU00005997.01	CHU00005997.11
26.	CHU00006004.01	CHU00006004.08
27.	CHU00006009.01	CHU00006009.06
28.	CHU00006362.01	CHU00006362.05
29.	CHU00006381	
30.	CHU00009188.01	CHU00009188.02
31.	CHU00009205.01	CHU00009205.06
32.	CHU00011251	CHU00011793
33.	CHU00011251	CHU00011793
34.	CHU00011820	CHU00011981
35.	CHU000123742.01	CHU00123742.09
36.	CHU000125162.01	CHU000125162.15
37.	CHU000125296	CHU00125373
38.	CHU00013773	CHU00014090
39.	CHU00014182.01	CHU00014182.08
40.	CHU00014189.01	CHU00014189.12
41.	CHU00014196.01	CHU00014196.04
42.	CHU00014197.01	CHU00014197.02
43.	CHU00014198.01	CHU00014198.05

44.	CHU00014198.01	CHU00014198.05
45.	CHU00014200.01	CHU00014200.05
46.	CHU00014202.01	CHU00014202.05
47.	CHU00014204.01	CHU00014204.03
48.	CHU00014205.01	CHU00014205.03
49.	CHU00014206.01	CHU00014206.03
50.	CHU00014207.01	CHU00014207.02
51.	CHU00014208.01	CHU00014208.05
52.	CHU00014210.01	CHU00014210.05
53.	CHU00014212.01	CHU00014212.03
54.	CHU00014213.01	CHU00014213.05
55.	CHU00014215.01	CHU00014215.09
56.	CHU00014215.01	CHU00014215.09
57.	CHU00014215.01	CHU00014215.09
58.	CHU00014218	CHU00014218
59.	CHU00014218	CHU00014218
60.	CHU00014218.01	CHU00014218.03
61.	CHU00014218.01	CHU00014218.03
62.	CHU00014218.01	CHU00014218.03
63.	CHU00014219.01	CHU00014219.12
64.	CHU00014223	CHU00014226
65.	CHU00014223	CHU00014226
66.	CHU00014223	CHU00014226
67.	CHU00014227	CHU00014229
68.	CHU00014227	CHU00014229
69.	CHU00014227.01	CHU00014227.08
70.	CHU00014227.01	CHU00014227.08
71.	CHU00014227.01	CHU00014227.08
72.	CHU00014230.01	CHU00014230.06
73.	CHU00014232	CHU00014232
74.	CHU00014232	CHU00014232
75.	CHU00014232.01	CHU00014232.03
76.	CHU00014232.01	CHU00014232.03
77.	CHU00014232.01	CHU00014232.03
78.	CHU00014398.01	CHU00014398.38
79.	CHU00016137	CHU00016137
80.	CHU00016887	CHU00016887
81.	CHU00016887.01	CHU00016887.30
82.	CHU00016977	CHU00016997
83.	CHU00017003	CHU00017003
84.	CHU00017026.01	CHU00017026.09
85.	CHU00017037	CHU00017037.23
86.	CHU00017037.01	CHU00017037.23
87.	CHU00017064.01	CHU00017064.06
88.	CHU00017069.01	CHU00017069.19
89.	CHU00017076	CHU00017090

90.	CHU00017092.01	CHU00017092.18
91.	CHU00017100.01	CHU00017100.16
92.	CHU00017115	CHU00017119
93.	CHU00017125.01	CHU00017125.15
94.	CHU00017130	CHU00017152
95.	CHU00017750	CHU00017756
96.	CHU00020660.01	CHU00020660.03
97.	CHU00020660.01	CHU00020660.03
98.	CHU00020660.01	CHU00020660.03
99.	CHU00020661.01	CHU00020661.05
100.	CHU00020661.01	CHU00020661.05
101.	CHU00020661.01	CHU00020661.05
102.	CHU00020725	CHU00020788
103.	CHU00020779	CHU00020781
104.	CHU00020779	CHU00020781
105.	CHU00020779.01	CHU00020779.07
106.	CHU00020779.01	CHU00020779.07
107.	CHU00020779.01	CHU00020779.07
108.	CHU00020782.01	CHU00020782.08
109.	CHU00021254	CHU00021414
110.	CHU00021254	CHU00021414
111.	CHU00021262.01	CHU00021262.05
112.	CHU00021262.01	CHU00021262.05
113.	CHU00021262.01	CHU00021262.05
114.	CHU00021268	CHU00021271
115.	CHU00021268	CHU00021271
116.	CHU00021268.01	CHU00021268.09
117.	CHU00021268.01	CHU00021268.09
118.	CHU00021268.01	CHU00021268.09
119.	CHU00021268.01	CHU00021268.09
120.	CHU00021272	CHU00021279
121.	CHU00021280.01	CHU00021280.14
122.	CHU00021289.01	CHU00021289.03
123.	CHU00021289.01	CHU00021289.03
124.	CHU00021289.01	CHU00021289.03
125.	CHU00021415	CHU00021766
126.	CHU00021415	CHU00021766
127.	CHU00021415	CHU00021766
128.	CHU00021415	CHU00021766
129.	CHU00021415	CHU00021766
130.	CHU00021415	CHU00021766
131.	CHU00021415	CHU00021766
132.	CHU00021415	CHU00021766
133.	CHU00021791.01	CHU00021791.09
134.	CHU00022500	CHU00022767
135.	CHU00022583.01	CHU00022583.07

136.	CHU00022689.01	CHU00022689.03
137.	CHU00022696.01	CHU00022696.03
138.	CHU00022700.01	CHU00022700.03
139.	CHU00022701.01	CHU00022701.04
140.	CHU00022702.01	CHU00022702.03
141.	CHU00022704.01	CHU00022704.02
142.	CHU00022724.01	CHU00022724.05
143.	CHU00022728.01	CHU00022728.07
144.	CHU00022738.01	CHU00022738.05
145.	CHU00022743.01	CHU00022743.03
146.	CHU00022743.01	CHU00022743.03
147.	CHU00022768	CHU00022955
148.	CHU00023392.01	CHU00023392.07
149.	CHU00024519	CHU00025005
150.	CHU00024554.01	CHU00024554.14
151.	CHU00024560.01	CHU00024560.09
152.	CHU00024562	
153.	CHU00028178	CHU00028190
154.	CHU00028202.01	CHU00028202.02
155.	CHU00028203.01	CHU00028203.03
156.	CHU00028203.01	CHU00028203.03
157.	CHU00028203.01	CHU00028203.03
158.	CHU00028204.01	CHU00028204.07
159.	CHU00028207.01	CHU00028207.06
160.	CHU00028209.01	CHU00028209.05
161.	CHU00028209.01	CHU00028209.05
162.	CHU00028209.01	CHU00028209.05
163.	CHU00028211.01	CHU00028211.05
164.	CHU00028213.01	CHU00028213.04
165.	CHU00028215.01	CHU00028215.05
166.	CHU00028215.01	CHU00028215.05
167.	CHU00028215.01	CHU00028215.05
168.	CHU00028218.01	CHU00028218.07
169.	CHU00028221.01	CHU00028221.08
170.	CHU00028224.01	CHU00028224.05
171.	CHU00028224.01	CHU00028224.05
172.	CHU00028224.01	CHU00028224.05
173.	CHU00028227.01	CHU00028227.03
174.	CHU00028228.01	CHU00028228.03
175.	CHU00028228.01	CHU00028228.03
176.	CHU00028228.01	CHU00028228.03
177.	CHU00028229.01	CHU00028229.05
178.	CHU00028229.01	CHU00028229.05
179.	CHU00028229.01	CHU00028229.05
180.	CHU00028231.01	CHU00028231.07
181.	CHU00028234.01	CHU00028234.04

182.	CHU00028236.01	CHU00028236.04
183.	CHU00028238.01	CHU00028238.04
184.	CHU00028240.01	CHU00028240.03
185.	CHU00028240.01	CHU00028240.03
186.	CHU00028240.01	CHU00028240.03
187.	CHU00028241.01	CHU00028241.06
188.	CHU00028245.01	CHU00028245.04
189.	CHU00028248.01	CHU00028248.04
190.	CHU00028250.01	CHU00028250.04
191.	CHU00028252.01	CHU00028252.04
192.	CHU00028252.01	CHU00028252.04
193.	CHU00028252.01	CHU00028252.04
194.	CHU00028252.01	CHU00028252.04
195.	CHU00028252.01	CHU00028252.04
196.	CHU00028252.01	CHU00028252.04
197.	CHU00028254.01	CHU00028254.07
198.	CHU00028257.01	CHU00028257.06
199.	CHU00028260.01	CHU00028260.06
200.	CHU00028263.01	CHU00028263.05
201.	CHU00028263.01	CHU00028263.05
202.	CHU00028263.01	CHU00028263.05
203.	CHU00028263.01	CHU00028263.05
204.	CHU00028265.01	CHU00028265.05
205.	CHU00028267.01	CHU00028267.04
206.	CHU00028269.01	CHU00028269.08
207.	CHU00028273	CHU00028274
208.	CHU00028273	CHU00028273
209.	CHU00028273.01	CHU00028273.05
210.	CHU00028273.01	CHU00028273.05
211.	CHU00028273.01	CHU00028273.05
212.	CHU00028275.01	CHU00028275.05
213.	CHU00028277.01	CHU00028277.05
214.	CHU00028277.01	CHU00028277.05
215.	CHU00028277.01	CHU00028277.05
216.	CHU00028277.01	CHU00028277.05
217.	CHU00028277.01	CHU00028277.05
218.	CHU00028279.01	CHU00028279.04
219.	CHU00028281.01	CHU00028281.04
220.	CHU00028283.01	CHU00028283.06
221.	CHU00028283.01	CHU00028283.06
222.	CHU00028283.01	CHU00028283.06
223.	CHU00028286.01	CHU00028286.03
224.	CHU00028287.01	CHU00028287.05
225.	CHU00028289.01	CHU00028289.05
226.	CHU00028291.01	CHU00028291.05
227.	CHU00028291.01	CHU00028291.05

228.	CHU00028291.01	CHU00028291.05
229.	CHU00028293.01	CHU00028293.05
230.	CHU00028295.01	CHU00028295.05
231.	CHU00028297.01	CHU00028297.05
232.	CHU00028300.01	CHU00028300.04
233.	CHU00028300.01	CHU00028300.04
234.	CHU00028300.01	CHU00028300.04
235.	CHU00028302.01	CHU00028302.08
236.	CHU00028302.01	CHU00028302.08
237.	CHU00028302.01	CHU00028302.08
238.	CHU00028305.01	CHU00028305.12
239.	CHU00028311.01	CHU00028311.07
240.	CHU00028311.01	CHU00028311.07
241.	CHU00028311.01	CHU00028311.07
242.	CHU00028374.01	CHU00028374.05
243.	CHU00028374.01	CHU00028374.05
244.	CHU00028374.01	CHU00028374.05
245.	CHU00028376.01	CHU00028376.03
246.	CHU00028376.01	CHU00028376.03
247.	CHU00028376.01	CHU00028376.03
248.	CHU00028377.01	CHU00028377.06
249.	CHU00028380.01	CHU00028380.04
250.	CHU00028382.01	CHU00028382.02
251.	CHU00028383.01	CHU00028383.05
252.	CHU00028385.01	CHU00028385.06
253.	CHU00028385.01	CHU00028385.06
254.	CHU00028385.01	CHU00028385.06
255.	CHU00028385.01	CHU00028385.06
256.	CHU00028388.01	CHU00028388.06
257.	CHU00028393.01	CHU00028393.03
258.	CHU00028393.01	CHU00028393.03
259.	CHU00028393.01	CHU00028393.03
260.	CHU00028393.01	CHU00028393.03
261.	CHU00028394.01	CHU00028394.05
262.	CHU00028396.01	CHU00028396.05
263.	CHU00028396.01	CHU00028396.05
264.	CHU00028396.01	CHU00028396.05
265.	CHU00028396.01	CHU00028396.05
266.	CHU00028398.01	CHU00028398.05
267.	CHU00028398.01	CHU00028398.05
268.	CHU00028398.01	CHU00028398.05
269.	CHU00028398.01	CHU00028398.05
270.	CHU00028398.01	CHU00028398.05
271.	CHU00028398.01	CHU00028398.05
272.	CHU00028400.01	CHU00028400.05
273.	CHU00028400.01	CHU00028400.05

274.	CHU00028400.01	CHU00028400.05
275.	CHU00028400.01	CHU00028400.05
276.	CHU00028400.01	CHU00028400.05
277.	CHU00028424.01	CHU00028424.03
278.	CHU00028424.01	CHU00028424.03
279.	CHU00028424.01	CHU00028424.03
280.	CHU00028425	CHU00028426
281.	CHU00028425.01	CHU00028425.05
282.	CHU00028425.01	CHU00028425.05
283.	CHU00028427	CHU00028429
284.	CHU00028427.01	CHU00028427.07
285.	CHU00028427.01	CHU00028427.07
286.	CHU00028430.01	CHU00028430.05
287.	CHU00028432	CHU00028433
288.	CHU00028432.01	CHU00028432.05
289.	CHU00028432.01	CHU00028432.07
290.	CHU00028434	CHU00028434
291.	CHU00028434.01	CHU00028434.03
292.	CHU00028434.01	CHU00028434.03
293.	CHU00028435.01	CHU00028435.03
294.	CHU00028436.01	CHU00028436.05
295.	CHU00028438.01	CHU00028438.03
296.	CHU00028438.01	CHU00028438.03
297.	CHU00028438.01	CHU00028438.03
298.	CHU00028439	CHU00028440
299.	CHU00028439.01	CHU00028439.04
300.	CHU00028439.01	CHU00028439.04
301.	CHU00028441.01	CHU00028441.13
302.	CHU00028441.01	CHU00028441.13
303.	CHU00028441.01	CHU00028441.13
304.	CHU00028441.01	CHU00028441.13
305.	CHU00028441.01	CHU00028441.13
306.	CHU00028441.01	CHU00028441.13
307.	CHU00028447.01	CHU00028447.04
308.	CHU00028449.01	CHU00028449.04
309.	CHU00028451.01	CHU00028451.05
310.	CHU00028453.01	CHU00028453.08
311.	CHU00028456.01	CHU00028456.03
312.	CHU00028457	CHU00028458
313.	CHU00028457.01	CHU00028457.04
314.	CHU00028457.01	CHU00028457.04
315.	CHU00028459.01	CHU00028459.04
316.	CHU00028461.01	CHU00028461.06
317.	CHU00028463.01	CHU00028463.04
318.	CHU00028463.01	CHU00028463.04
319.	CHU00028463.01	CHU00028463.04

320.	CHU00028463.01	CHU00028463.04
321.	CHU00028465.01	CHU00028465.04
322.	CHU00028467.01	CHU00028467.04
323.	CHU00028469.01	CHU00028469.06
324.	CHU00028472.01	CHU00028472.06
325.	CHU00028475.01	CHU00028475.14
326.	CHU00028477.01	CHU00028771.04
327.	CHU00028482.01	CHU00028482.10
328.	CHU00028487	CHU00028489
329.	CHU00028487.01	CHU00028487.06
330.	CHU00028487.01	CHU00028487.06
331.	CHU00028490.01	CHU00028490.07
332.	CHU00028490.01	CHU00028490.07
333.	CHU00028490.01	CHU00028490.07
334.	CHU00028493.01	CHU00028493.05
335.	CHU00028495	CHU00028496
336.	CHU00028495.01	CHU00028495.04
337.	CHU00028495.01	CHU00028495.04
338.	CHU00028497	CHU00028497
339.	CHU00028497.01	CHU00028497.03
340.	CHU00028497.01	CHU00028497.03
341.	CHU00028499.01	CHU00028499.04
342.	CHU00028501	CHU00028502
343.	CHU00028501	CHU00028502
344.	CHU00028501.01	CHU00028501.05
345.	CHU00028501.01	CHU00028501.05
346.	CHU00028501.01	CHU00028501.05
347.	CHU00028503.01	CHU00028503.05
348.	CHU00028503.01	CHU00028503.05
349.	CHU00028503.01	CHU00028503.05
350.	CHU00028505	CHU00028506
351.	CHU00028505.01	CHU00028505.06
352.	CHU00028505.01	CHU00028505.06
353.	CHU00028507.01	CHU00028507.03
354.	CHU00028507.01	CHU00028507.03
355.	CHU00028508.01	CHU00028508.05
356.	CHU00028514	CHU00028515
357.	CHU00028514.01	CHU00028514.06
358.	CHU00028514.01	CHU00028514.06
359.	CHU00028516	CH000028518
360.	CHU00028516.01	CHU00028516.07
361.	CHU00028516.01	CHU00028516.07
362.	CHU00028521	CHU00028523
363.	CHU00028521.01	CHU00028521.07
364.	CHU00028521.01	CHU00028521.07
365.	CHU00028524	CHU00028525

366.	CHU00028524	CHU00028525
367.	CHU00028524.01	CHU00028524.05
368.	CHU00028524.01	CHU00028524.05
369.	CHU00028524.01	CHU00028524.05
370.	CHU00028530.01	CHU00028530.02
371.	CHU00028531.01	CHU00028531.03
372.	CHU00028532.01	CHU00028532.04
373.	CHU00028544.01	CHU00028544.07
374.	CHU00028548.01	CHU00028548.07
375.	CHU00028551.01	CHU00028551.08
376.	CHU00028555.01	CHU00028555.02
377.	CHU00028556.01	CHU00028556.05
378.	CHU00028558.01	CHU00028558.02
379.	CHU00028558.01	CHU00028558.02
380.	CHU00028558.01	CHU00028558.02
381.	CHU00028559.01	CHU00028559.04
382.	CHU00028565.01	CHU00028565.04
383.	CHU00028565.01	CHU00028565.04
384.	CHU00028589.01	CHU00028589.07
385.	CHU00028589.01	CHU00028589.07
386.	CHU00028589.01	CHU00028589.07
387.	CHU00028589.01	CHU00028589.07
388.	CHU00028589.01	CHU00028589.07
389.	CHU00028589.01	CHU00028589.07
390.	CHU00028591	CHU00028591
391.	CHU00028592	CHU00028595
392.	CHU00028596.01	CHU00028596.03
393.	CHU00028597.01	CHU00028597.02
394.	CHU00028597.01	CHU00028597.02
395.	CHU00028597.01	CHU00028597.02
396.	CHU00028598.01	CHU00028598.03
397.	CHU00028599.01	CHU00028599.05
398.	CHU00028599.01	CHU00028599.05
399.	CHU00028599.01	CHU00028599.05
400.	CHU00028602.01	CHU00028602.05
401.	CHU00028604.01	CHU00028604.05
402.	CHU00028606.01	CHU00028606.09
403.	CHU00028606.01	CHU00028606.09
404.	CHU00028606.01	CHU00028606.09
405.	CHU00028612.01	CHU00028612.03
406.	CHU00028613	CHU00028614
407.	CHU00028613	CHU00028614
408.	CHU00028613.01	CHU00028613.05
409.	CHU00028613.01	CHU00028613.05
410.	CHU00028613.01	CHU00028613.05
411.	CHU00028613.01	CHU00028613.05

412.	CHU00028615.01	CHU00028615.02
413.	CHU00028621.01	CHU00028621.05
414.	CHU00028623.01	CHU00028623.05
415.	CHU00028625.01	CHU00028625.06
416.	CHU00028632.01	CHU00028632.07
417.	CHU00028632.01	CHU00028632.07
418.	CHU00028632.01	CHU00028632.07
419.	CHU00028635.01	CHU00028635.06
420.	CHU00028638.01	CHU00028638.03
421.	CHU00028638.01	CHU00028638.03
422.	CHU00028638.01	CHU00028638.03
423.	CHU00028639.01	CHU00028639.07
424.	CHU00028642.01	CHU00028642.07
425.	CHU00028642.01	CHU00028642.07
426.	CHU00028642.01	CHU00028642.07
427.	CHU00028645.01	CHU00028645.04
428.	CHU00028645.01	CHU00028645.04
429.	CHU00028645.01	CHU00028645.04
430.	CHU00028647.01	CHU00028647.03
431.	CHU00028648.01	CHU00028648.07
432.	CHU00028648.01	CHU00028648.07
433.	CHU00028648.01	CHU00028648.07
434.	CHU00028651.01	CHU00028651.05
435.	CHU00028651.01	CHU00028651.05
436.	CHU00028651.01	CHU00028651.05
437.	CHU00028653.01	CHU00028653.03
438.	CHU00028654.01	CHU00028654.06
439.	CHU00028654.01	CHU00028654.06
440.	CHU00028654.01	CHU00028654.06
441.	CHU00028656.01	CHU00028656.05
442.	CHU00028656.01	CHU00028656.05
443.	CHU00028656.01	CHU00028656.05
444.	CHU00028658.01	CHU00028658.05
445.	CHU00028660.01	CHU00028660.01
446.	CHU00028661.01	CHU00028661.05
447.	CHU00028661.01	CHU00028661.05
448.	CHU00028661.01	CHU00028661.05
449.	CHU00028663.01	CHU00028663.07
450.	CHU00028666.01	CHU00028666.04
451.	CHU00028668.01	CHU00028668.04
452.	CHU00028670.01	CHU00028670.04
453.	CHU00028670.01	CHU00028670.04
454.	CHU00028670.01	CHU00028670.04
455.	CHU00028670.01	CHU00028670.04
456.	CHU00028670.01	CHU00028670.04
457.	CHU00028672.01	CHU00028672.05

458.	CHU00028672.01	CHU00028672.05
459.	CHU00028672.01	CHU00028672.05
460.	CHU00028674.01	CHU00028674.08
461.	CHU00028674.01	CHU00028674.08
462.	CHU00028674.01	CHU00028674.08
463.	CHU00028677.01	CHU00028677.08
464.	CHU00028685.01	CHU00028685.04
465.	CHU00028685.01	CHU00028685.05
466.	CHU00028687.01	CHU00028687.04
467.	CHU00028687.01	CHU00028687.04
468.	CHU00028687.01	CHU00028687.04
469.	CHU00028689.01	CHU00028689.05
470.	CHU00028689.01	CHU00028689.05
471.	CHU00028689.01	CHU00028689.05
472.	CHU00028689.01	CHU00028689.05
473.	CHU00028691.01	CHU00028691.07
474.	CHU00028691.01	CHU00028691.07
475.	CHU00028691.01	CHU00028691.07
476.	CHU00028698.01	CHU00028698.03
477.	CHU00028699.01	CHU00028699.05
478.	CHU00028701.01	CHU00028701.06
479.	CHU00028701.01	CHU00028701.06
480.	CHU00028701.01	CHU00028701.06
481.	CHU00028705.01	CHU00028705.04
482.	CHU00028705.01	CHU00028705.04
483.	CHU00028707.01	CHU00028707.08
484.	CHU00028707.01	CHU00028707.08
485.	CHU00028707.01	CHU00028707.08
486.	CHU00028711.01	CHU00028711.04
487.	CHU00028711.01	CHU00028711.04
488.	CHU00028711.01	CHU00028711.04
489.	CHU00028713.01	CHU00028713.05
490.	CHU00028716.01	CHU00028716.03
491.	CHU00028717.01	CHU00028717.10
492.	CHU00028723	CHU00028724
493.	CHU00028723	CHU00028724
494.	CHU00028723.01	CHU00028723.06
495.	CHU00028723.01	CHU00028723.06
496.	CHU00028723.01	CHU00028723.06
497.	CHU00028725.01	CHU00028725.07
498.	CHU00028725.01	CHU00028725.07
499.	CHU00028725.01	CHU00028725.07
500.	CHU00028725.01	CHU00028725.05
501.	CHU00028725.01	CHU00028725.07
502.	CHU00028728.01	CHU00028728.05
503.	CHU00028730.01	CHU00028730.08

504.	CHU00028730.01	CHU00028730.08
505.	CHU00028730.01	CHU00028730.08
506.	CHU00028730.01	CHU00028730.08
507.	CHU00028734.01	CHU00028734.04
508.	CHU00028734.01	CHU00028734.04
509.	CHU00028734.01	CHU00028734.04
510.	CHU00028736	CHU00028736
511.	CHU00028737	CHU00028737
512.	CHU00028737	CHU00028737
513.	CHU00028740.01	CHU00028740.09
514.	CHU00028740.01	CHU00028740.09
515.	CHU00028740.01	CHU00028740.09
516.	CHU00028744.01	CHU00028744.05
517.	CHU00028746.01	CHU00028746.06
518.	CHU00028746.01	CHU00028746.06
519.	CHU00028746.01	CHU00028746.06
520.	CHU00028746.01	CHU00028746.06
521.	CHU00028749.01	CHU00028749.07
522.	CHU00028752.01	CHU00028752.08
523.	CHU00028752.01	CHU00028752.08
524.	CHU00028752.01	CHU00028752.08
525.	CHU00028755	CHU00028756
526.	CHU00028755	CHU00028756
527.	CHU00028755.01	CHU00028755.06
528.	CHU00028755.01	CHU00028755.06
529.	CHU00028755.01	CHU00028755.06
530.	CHU00028757	CHU00028757
531.	CHU00028758.01	CHU00028758.04
532.	CHU00028758.01	CHU00028758.04
533.	CHU00028760.01	CHU00028760.07
534.	CHU00028760.01	CHU00028760.07
535.	CHU00028760.01	CHU00028760.07
536.	CHU00028760.01	CHU00028760.07
537.	CHU00028763.01	CHU00028763.11
538.	CHU00028763.01	CHU00028763.11
539.	CHU00028768.01	CHU00028768.08
540.	CHU00028768.01	CHU00028768.08
541.	CHU00028768.01	CHU00028768.08
542.	CHU00028768.01	CHU00028768.08
543.	CHU00028771.01	CHU00028771.04
544.	CHU00028773.01	CHU00028773.05
545.	CHU00028776.01	CHU00028776.11
546.	CHU00028776.01	CHU00028776.11
547.	CHU00028781.01	CHU00028781.07
548.	CHU00028781.01	CHU00028781.07
549.	CHU00028781.01	CHU00028781.07

550.	CHU00028784.01	CHU00028784.05
551.	CHU00028784.01	CHU00028784.05
552.	CHU00028786	CHU00028788
553.	CHU00028786	CHU00028788
554.	CHU00028786.01	CHU00028786.08
555.	CHU00028786.01	CHU00028786.08
556.	CHU00028786.01	CHU00028786.08
557.	CHU00028789.01	CHU00028789.05
558.	CHU00028789.01	CHU00028789.05
559.	CHU00028789.01	CHU00028789.05
560.	CHU00028791.01	CHU00028791.07
561.	CHU00028791.01	CHU00028791.07
562.	CHU00028791.01	CHU00028791.07
563.	CHU00028791.01	CHU00028791.07
564.	CHU00028794.01	CHU00028794.04
565.	CHU00028796.01	CHU00028796.07
566.	CHU00028799.01	CHU00028799.06
567.	CHU00028801.01	CHU00028801.05
568.	CHU00028803.01	CHU00028803.05
569.	CHU00028803.01	CHU00028803.05
570.	CHU00028803.01	CHU00028803.05
571.	CHU00028803.01	CHU00028803.05
572.	CHU00028803.01	CHU00028803.05
573.	CHU00028805.01	CHU00028805.05
574.	CHU00028807.01	CHU00028807.06
575.	CHU00028809	CHU00028810
576.	CHU00028809	CHU00028810
577.	CHU00028809	CHU00028810
578.	CHU00028809	CHU00028810
579.	CHU00028809.01	CHU00028809.05
580.	CHU00028809.01	CHU00028809.05
581.	CHU00028809.01	CHU00028809.05
582.	CHU00028809.01	CHU00028809.05
583.	CHU00028809.01	CHU00028809.05
584.	CHU00028811.01	CHU00028811.04
585.	CHU00028813.01	CHU00028813.04
586.	CHU00028815.01	CHU00028815.04
587.	CHU00028815.01	CHU00028815.04
588.	CHU00028815.01	CHU00028815.04
589.	CHU00028817.01	CHU00028817.11
590.	CHU00028821.01	CHU00028821.06
591.	CHU00028841	CHU00028843
592.	CHU00028841	CHU00028843
593.	CHU00028841.01	CHU00028841.09
594.	CHU00028841.01	CHU00028841.09
595.	CHU00028841.01	CHU00028841.09

596.	CHU00028848.01	CHU00028848.08
597.	CHU00028851	CHU00028852
598.	CHU00028851	CHU00028852
599.	CHU00028851.01	CHU00028851.06
600.	CHU00028851.01	CHU00028851.06
601.	CHU00028851.01	CHU00028851.06
602.	CHU00028853.01	CHU00028853.06
603.	CHU00028856.01	CHU00028856.05
604.	CHU00028858.01	CHU00028858.14
605.	CHU00028865.01	CHU00028865.07
606.	CHU00028865.01	CHU00028865.07
607.	CHU00028865.01	CHU00028865.07
608.	CHU00028865.01	CHU00028865.07
609.	CHU00028868.01	CHU00028868.03
610.	CHU00028869	CHU00028872
611.	CHU00028869	CHU00028872
612.	CHU00028869.01	CHU00028869.08
613.	CHU00028869.01	CHU00028869.08
614.	CHU00028869.01	CHU00028869.08
615.	CHU00028873.01	CHU00028873.03
616.	CHU00028873.01	CHU00028873.03
617.	CHU00028873.01	CHU00028873.03
618.	CHU00028874.01	CHU00028874.07
619.	CHU00028877	CHU00028878
620.	CHU00028877	CHU00028878
621.	CHU00028877.01	CHU00028877.06
622.	CHU00028877.01	CHU00028877.06
623.	CHU00028877.01	CHU00028877.06
624.	CHU00028877.01	CHU00028877.06
625.	CHU00028882.01	CHU00028882.05
626.	CHU00028884.01	CHU00028884.06
627.	CHU00028887.01	CHU00028887.05
628.	CHU00028887.01	CHU00028887.05
629.	CHU00028887.01	CHU00028887.05
630.	CHU00028889	CHU00028892
631.	CHU00028889.01	CHU00028889.08
632.	CHU00028889.01	CHU00028889.08
633.	CHU00028889.01	CHU00028889.08
634.	CHU00028893.01	CHU00028893.07
635.	CHU00028896.01	CHU00028896.03
636.	CHU00028897.01	CHU00028897.05
637.	CHU00028899.01	CHU00028899.05
638.	CHU00028901.01	CHU00028901.03
639.	CHU00028907	CHU00028907
640.	CHU00028907	CHU00028907
641.	CHU00028907.01	CHU00028907.02

642.	CHU00028907.01	CHU00028907.02
643.	CHU00028907.01	CHU00028907.02
644.	CHU00028908.01	CHU00028908.03
645.	CHU00028909	CHU00028911
646.	CHU00028909	CHU00028911
647.	CHU00028909.01	CHU00028909.06
648.	CHU00028909.01	CHU00028909.06
649.	CHU00028909.01	CHU00028909.06
650.	CHU00028912	CHU00028914
651.	CHU00028912	CHU00028914
652.	CHU00028912.01	CHU00028912.08
653.	CHU00028912.01	CHU00028912.08
654.	CHU00028912.01	CHU00028912.08
655.	CHU00028930.01	CHU00028930.06
656.	CHU00028930.01	CHU00028930.06
657.	CHU00028930.01	CHU00028930.06
658.	CHU00028933	CHU00028933
659.	CHU00028933	CHU00028933
660.	CHU00028933.01	CHU00028933.27
661.	CHU00028933.01	CHU00028933.27
662.	CHU00028933.01	CHU00028933.27
663.	CHU00028948.01	CHU00028948.04
664.	CHU00028950.01	CHU00028950.04
665.	CHU00028952.01	CHU00028952.06
666.	CHU00028952.01	CHU00028952.06
667.	CHU00028952.01	CHU00028952.06
668.	CHU00028955.01	CHU00028955.07
669.	CHU00028955.01	CHU00028955.07
670.	CHU00028955.01	CHU00028955.07
671.	CHU00028958.01	CHU00028958.03
672.	CHU00028959.01	CHU00028959.02
673.	CHU00028960.01	CHU00028960.04
674.	CHU00028962.01	CHU00028962.04
675.	CHU00028964.01	CHU00028964.05
676.	CHU00028966.01	CHU00028966.06
677.	CHU00028968	CHU00028969
678.	CHU00028968	CHU00028969
679.	CHU00028968.01	CHU00028968.05
680.	CHU00028968.01	CHU00028968.05
681.	CHU00028968.01	CHU00028968.05
682.	CHU00028970.01	CHU00028970.05
683.	CHU00028972.01	CHU00028972.05
684.	CHU00028975.01	CHU00028975.06
685.	CHU00028975.01	CHU00028975.06
686.	CHU00028975.01	CHU00028975.06
687.	CHU00028985	CHU00028989

688.	CHU00028993	CHU00029014
689.	CHU00029039.01	CHU00029039.07
690.	CHU00029039.01	CHU00029039.07
691.	CHU00029039.01	CHU00029039.07
692.	CHU00029044	CHU00029045
693.	CHU00029046.01	CHU00029046.05
694.	CHU00029048.01	CHU00029048.06
695.	CHU00029050	CHU00029051
696.	CHU00029050	CHU00029051
697.	CHU00029050.01	CHU00029050.04
698.	CHU00029050.01	CHU00029050.04
699.	CHU00029050.01	CHU00029050.04
700.	CHU00029059.01	CHU00029059.07
701.	CHU00029059.01	CHU00029059.07
702.	CHU00029059.01	CHU00029059.07
703.	CHU00029062.01	CHU00029062.07
704.	CHU00029065.01	CHU00029065.07
705.	CHU00029065.01	CHU00029065.07
706.	CHU00029065.01	CHU00029065.07
707.	CHU00029068.01	CHU00029068.03
708.	CHU00029070	CHU00029082
709.	CHU00029084	CHU00029086
710.	CHU00029105.01	CHU00029105.09
711.	CHU00029105.01	CHU00029105.09
712.	CHU00029105.01	CHU00029105.09
713.	CHU00029108.01	CHU00029108.05
714.	CHU00029108.01	CHU00029108.05
715.	CHU00029108.01	CHU00029108.05
716.	CHU00029110.01	CHU00029110.14
717.	CHU00029110.01	CHU00029110.14
718.	CHU00029110.01	CHU00029110.14
719.	CHU00029116.01	CHU00029116.12
720.	CHU00029116.01	CHU00029116.12
721.	CHU00029116.01	CHU00029116.12
722.	CHU00029131.01	CHU00029131.17
723.	CHU00029131.01	CHU00029131.17
724.	CHU00029131.01	CHU00029131.17
725.	CHU00029131.01	CHU00029131.17
726.	CHU00029138.01	CHU00029138.14
727.	CHU00029144.01	CHU00029144.09
728.	CHU00029144.01	CHU00029144.09
729.	CHU00029144.01	CHU00029144.09
730.	CHU00029144.01	CHU00029144.09
731.	CHU00029144.01	CHU00029144.09
732.	CHU00029144.01	CHU00029144.09
733.	CHU00029147.01	CHU00029147.11

734.	CHU00029147.01	CHU00029147.11
735.	CHU00029152.01	CHU00029152.07
736.	CHU00029152.01	CHU00029152.07
737.	CHU00029152.01	CHU00029152.07
738.	CHU00029152.01	CHU00029152.07
739.	CHU00029155.01	CHU00029155.19
740.	CHU00029155.01	CHU00029155.19
741.	CHU00029155.01	CHU00029155.19
742.	CHU00029163.01	CHU00029163.19
743.	CHU00029163.01	CHU00029163.19
744.	CHU00029163.01	CHU00029163.19
745.	CHU00029171.01	CHU00029171.11
746.	CHU00029175.01	CHU00029175.11
747.	CHU00029175.01	CHU00029175.11
748.	CHU00029175.01	CHU00029175.11
749.	CHU00029179.01	CHU00029179.14
750.	CHU00029179.01	CHU00029179.14
751.	CHU00029179.01	CHU00029179.14
752.	CHU00029179.01	CHU00029179.14
753.	CHU00029179.01	CHU00029179.14
754.	CHU00029185.01	CHU00029185.11
755.	CHU00029185.01	CHU00029185.11
756.	CHU00029185.01	CHU00029185.11
757.	CHU00029185.01	CHU00029185.11
758.	CHU00029185.01	CHU00029185.11
759.	CHU00029185.01	CHU00029185.11
760.	CHU00029189.01	CHU00029189.04
761.	CHU00029189.01	CHU00029189.04
762.	CHU00029189.01	CHU00029189.04
763.	CHU00029191.01	CHU00029191.08
764.	CHU00029191.01	CHU00029191.08
765.	CHU00029191.01	CHU00029191.08
766.	CHU00029214	CHU00029220
767.	CHU00029214	CHU00029220
768.	CHU00029221	CHU00029227
769.	CHU00029228.01	CHU00029228.08
770.	CHU00029228.01	CHU00029228.08
771.	CHU00029228.01	CHU00029228.08
772.	CHU00029228.01	CHU00029228.08
773.	CHU00029231	CHU00029234
774.	CHU00029235.01	CHU00029235.08
775.	CHU00029235.01	CHU00029235.08
776.	CHU00029235.01	CHU00029235.08
777.	CHU00029235.01	CHU00029235.08
778.	CHU00029238.01	CHU00029238.09
779.	CHU00029238.01	CHU00029238.09

780.	CHU00029242.01	CHU00029242.09
781.	CHU00029245.01	CHU00029245.08
782.	CHU00029245.01	CHU00029245.08
783.	CHU00029245.01	CHU00029245.08
784.	CHU00029245.01	CHU00029245.08
785.	CHU00029248	CHU00029258
786.	CHU00029248	CHU00029258
787.	CHU00029259.01	CHU00029259.08
788.	CHU00029259.01	CHU00029259.08
789.	CHU00029259.01	CHU00029259.08
790.	CHU00029262	CHU00029264
791.	CHU00029262	CHU00029264
792.	CHU00029262.01	CHU00029262.08
793.	CHU00029262.01	CHU00029262.08
794.	CHU00029262.01	CHU00029262.08
795.	CHU00029269	CHU00029273
796.	CHU00029279.01	CHU00029279.06
797.	CHU00029281.01	CHU00029281.14
798.	CHU00029281.01	CHU00029281.14
799.	CHU00029281.01	CHU00029281.14
800.	CHU00029293.01	CHU00029293.14
801.	CHU00029293.01	CHU00029293.14
802.	CHU00029316	CHU00029320
803.	CHU00029316	CHU00029320
804.	CHU00029316.01	CHU00029316.13
805.	CHU00029316.01	CHU00029316.13
806.	CHU00029316.01	CHU00029316.13
807.	CHU00029340	CHU00029534
808.	CHU00029753	CHU00029753
809.	CHU00029944.01	CHU00029944.24
810.	CHU00029957.01	CHU00029957.22
811.	CHU00029967.01	CHU00029967.10
812.	CHU00029971.01	CHU00029971.05
813.	CHU00029977.01	CHU00029977.17
814.	CHU00029985.01	CHU00029985.06
815.	CHU00029987.01	CHU00029987.05
816.	CHU00029989.01	CHU00029989.03
817.	CHU00029990.01	CHU00029990.09
818.	CHU00029999.01	CHU00029999.06
819.	CHU0002SS07	CHU0002SS07
820.	CHU00030001.01	CHU00030001.09
821.	CHU00030005.01	CHU00030005.10
822.	CHU00030008.01	CHU00030008.06
823.	CHU00030014.01	CHU00030014.16
824.	CHU00030020.01	CHU00030020.15
825.	CHU00030026.01	CHU00030026.10

826.	CHU00030030.01	CHU00030030.10
827.	CHU00030034.01	CHU00030034.06
828.	CHU00030036.01	CHU00030036.11
829.	CHU00030036.01	CHU00030036.11
830.	CHU00030036.01	CHU00030036.11
831.	CHU00030040	
832.	CHU00030040.01	CHU00030040.03
833.	CHU00030045.01	CHU00030045.16
834.	CHU00030051.01	CHU00030051.03
835.	CHU00030051.01	CHU00030051.03
836.	CHU00030051.01	CHU00030051.03
837.	CHU00030052	CHU00030053
838.	CHU00030056.01	CHU00030056.06
839.	CHU00030056.01	CHU00030056.06
840.	CHU00030058.01	CHU00030058.07
841.	CHU00030058.01	CHU00030058.07
842.	CHU00030058.01	CHU00030058.07
843.	CHU00030060.01	CHU00030060.11
844.	CHU00030060.01	CHU00030060.11
845.	CHU00030060.01	CHU00030060.11
846.	CHU00030064.01	CHU00030064.06
847.	CHU00030064.01	CHU00030064.06
848.	CHU00030064.01	CHU00030064.06
849.	CHU00030066.01	CHU00030066.03
850.	CHU00030067.01	CHU00030067.04
851.	CHU00030068.01	CHU00030068.05
852.	CHU00030070.01	CHU00030070.03
853.	CHU00030071.01	CHU00030071.22
854.	CHU00030079.01	CHU00030079.03
855.	CHU00030080.01	CHU00030080.05
856.	CHU00030085.01	CHU00030085.06
857.	CHU00030087.01	CHU00030087.04
858.	CHU00030228	CHU00030228
859.	CHU00030406.01	CHU00030406.06
860.	CHU00030406.01	CHU00030406.06
861.	CHU00030406.01	CHU00030406.06
862.	CHU00030408.01	CHU00030408.05
863.	CHU00030410.01	CHU00030410.10
864.	CHU00030414.01	CHU00030414.12
865.	CHU00030414.01	CHU00030414.12
866.	CHU00030414.01	CHU00030414.12
867.	CHU00030419.01	CHU00030419.06
868.	CHU00030421.01	CHU00030421.10
869.	CHU00030421.01	CHU00030421.10
870.	CHU00030426.01	CHU00030426.07
871.	CHU00030429.01	CHU00030429.05

872.	CHU00030431.01	CHU00030431.06
873.	CHU00030437	CHU00030438
874.	CHU00030437	CHU00030438
875.	CHU00030437.01	CHU00030437.06
876.	CHU00030437.01	CHU00030437.06
877.	CHU00030437.01	CHU00030437.06
878.	CHU00030439.01	CHU00030439.09
879.	CHU00030443.01	CHU00030443.14
880.	CHU00030449.01	CHU00030449.21
881.	CHU00030449.01	CHU00030449.21
882.	CHU00030449.01	CHU00030449.21
883.	CHU00030449.01	CHU00030449.21
884.	CHU00030449.01	CHU00030449.21
885.	CHU00030449.01	CHU00030449.21
886.	CHU00030458.01	CHU00030458.12
887.	CHU00030458.01	CHU00030458.12
888.	CHU00030458.01	CHU00030458.12
889.	CHU00030463.01	CHU00030463.06
890.	CHU00030465.01	CHU00030465.09
891.	CHU00030468.01	CHU00030468.10
892.	CHU00030472.01	CHU00030472.06
893.	CHU00030474.01	CHU00030474.03
894.	CHU00030475.01	CHU00030475.05
895.	CHU00030477.01	CHU00030477.16
896.	CHU00030483.01	CHU00030483.16
897.	CHU00030491.01	CHU00030491.09
898.	CHU00030495.01	CHU00030495.06
899.	CHU00030495.01	CHU00030495.06
900.	CHU00030495.01	CHU00030495.06
901.	CHU00030497.01	CHU00030497.05
902.	CHU00030499.01	CHU00030499.04
903.	CHU00030499.01	CHU00030499.04
904.	CHU00030499.01	CHU00030499.04
905.	CHU00030500.01	CHU00030500.05
906.	CHU00030502.01	CHU00030502.07
907.	CHU00030505.01	CHU00030505.03
908.	CHU00030506.01	CHU00030506.16
909.	CHU00030512.01	CHU00030512.19
910.	CHU00030520.01	CHU00030520.10
911.	CHU00030524	CHU00030525
912.	CHU00030526.01	CHU00030526.11
913.	CHU00030530.01	CHU00030530.08
914.	CHU00030530.01	CHU00030530.08
915.	CHU00030530.01	CHU00030530.08
916.	CHU00030530.01	CHU00030530.08
917.	CHU00030530.01	CHU00030530.08

918.	CHU00030533.01	CHU00030533.10
919.	CHU00030537.01	CHU00030537.06
920.	CHU00030539.01	CHU00030539.10
921.	CHU00030543.01	CHU00030543.10
922.	CHU00030547.01	CHU00030547.15
923.	CHU00030553.01	CHU00030553.09
924.	CHU00030553.01	CHU00030553.09
925.	CHU00030557.01	CHU00030557.05
926.	CHU00030559.01	CHU00030559.10
927.	CHU00030559.01	CHU00030559.10
928.	CHU00030559.01	CHU00030559.10
929.	CHU00030559.01	CHU00030559.10
930.	CHU00030661.01	CHU00030661.08
931.	CHU00030664.01	CHU00030664.02
932.	CHU00030665.01	CHU00030665.08
933.	CHU00030668.01	CHU00030668.05
934.	CHU00030670.01	CHU00030670.14
935.	CHU00030670.01	CHU00030670.14
936.	CHU00030675.01	CHU00030675.11
937.	CHU00030679	CHU00030679
938.	CHU00030679	CHU00030679
939.	CHU00030679.01	CHU00030679.13
940.	CHU00030679.01	CHU00030679.13
941.	CHU00030679.01	CHU00030679.13
942.	CHU00030679.01	CHU00030679.13
943.	CHU00030684.01	CHU00030684.11
944.	CHU00030688	CHU00030691
945.	CHU00030688	CHU00030691
946.	CHU00030688.01	CHU00030688.08
947.	CHU00030688.01	CHU00030688.08
948.	CHU00030688.01	CHU00030688.08
949.	CHU00030692.01	CHU00030692.08
950.	CHU00030695	CHU00030697
951.	CHU00030695	CHU00030697
952.	CHU00030695.01	CHU00030695.08
953.	CHU00030695.01	CHU00030695.08
954.	CHU00030695.01	CHU00030695.08
955.	CHU00030698.01	CHU00030698.08
956.	CHU00030698.01	CHU00030698.08
957.	CHU00030698.01	CHU00030698.08
958.	CHU00030701.01	CHU00030701.12
959.	CHU00030701.01	CHU00030701.12
960.	CHU00030701.01	CHU00030701.12
961.	CHU00030701.01	CHU00030701.12
962.	CHU00030705.01	CHU00030705.11
963.	CHU00030713.01	CHU00030713.11

964.	CHU00030713.01	CHU00030713.11
965.	CHU00030713.01	CHU00030713.11
966.	CHU00030717.01	CHU00030717.08
967.	CHU00030720.01	CHU00030720.20
968.	CHU00030720.01	CHU00030720.20
969.	CHU00030720.01	CHU00030720.20
970.	CHU00030720.01	CHU00030720.20
971.	CHU00030728.01	CHU00030728.06
972.	CHU00030731.01	CHU00030731.08
973.	CHU00030731.01	CHU00030731.08
974.	CHU00030731.01	CHU00030731.08
975.	CHU00030731.01	CHU00030731.08
976.	CHU00030731.01	CHU00030731.08
977.	CHU00030731.01	CHU00030731.08
978.	CHU00030731.01	CHU00030731.08
979.	CHU00030734.01	CHU00030734.11
980.	CHU00030738.01	CHU00030738.08
981.	CHU00030741.01	CHU00030741.11
982.	CHU00030745.01	CHU00030745.09
983.	CHU00030748.01	CHU00030748.03
984.	CHU00030749.01	CHU00030749.08
985.	CHU00030749.01	CHU00030749.08
986.	CHU00030749.01	CHU00030749.08
987.	CHU00030749.01	CHU00030749.08
988.	CHU00030749.01	CHU00030749.08
989.	CHU00030752.01	CHU00030752.11
990.	CHU00030756.01	CHU00030756.03
991.	CHU00030757.01	CHU00030757.15
992.	CHU00030757.01	CHU00030757.15
993.	CHU00030757.01	CHU00030757.15
994.	CHU00030763.01	CHU00030763.06
995.	CHU00030766	CHU00030767
996.	CHU00030766	CHU00030767
997.	CHU00030766.01	CHU00030766.04
998.	CHU00030766.01	CHU00030766.04
999.	CHU00030766.01	CHU00030766.04
1000.	CHU00030769.01	CHU00030769.04
1001.	CHU00030777	CHU00030780
1002.	CHU00030777	CHU00030780
1003.	CHU00030777.01	CHU00030777.10
1004.	CHU00030777.01	CHU00030777.10
1005.	CHU00030777.01	CHU00030777.10
1006.	CHU00030781.01	CHU00030781.04
1007.	CHU00030783.01	CHU00030783.09
1008.	CHU00030787.01	CHU00030787.19
1009.	CHU00030787.01	CHU00030787.19

1010.	CHU00030787.01	CHU00030787.19
1011.	CHU00030787.01	CHU00030787.19
1012.	CHU00030795.01	CHU00030795.04
1013.	CHU00030797.01	CHU00030797.06
1014.	CHU00030799	CHU00030800
1015.	CHU00030799	CHU00030800
1016.	CHU00030799.01	CHU00030799.05
1017.	CHU00030799.01	CHU00030799.05
1018.	CHU00030799.01	CHU00030799.05
1019.	CHU00030801.01	CHU00030801.05
1020.	CHU00030803	CHU00030804
1021.	CHU00030803.01	CHU00030803.04
1022.	CHU00030803.01	CHU00030803.04
1023.	CHU00030805.01	CHU00030805.05
1024.	CHU00030807.01	CHU00030807.09
1025.	CHU00030807.01	CHU00030807.09
1026.	CHU00030807.01	CHU00030807.09
1027.	CHU00030807.01	CHU00030807.09
1028.	CHU00030809.01	CHU00030809.14
1029.	CHU00030809.01	CHU00030809.14
1030.	CHU00030809.01	CHU00030809.14
1031.	CHU00030809.01	CHU00030809.14
1032.	CHU00030816.01	CHU00030816.09
1033.	CHU00030816.01	CHU00030816.09
1034.	CHU00030816.01	CHU00030816.09
1035.	CHU00030819	CHU00030822
1036.	CHU00030819	CHU00030822
1037.	CHU00030819.01	CHU00030819.10
1038.	CHU00030819.01	CHU00030819.10
1039.	CHU00030819.01	CHU00030819.10
1040.	CHU00030823.01	CHU00030823.10
1041.	CHU00030827.01	CHU00030827.09
1042.	CHU00030831.01	CHU00030831.10
1043.	CHU00030831.01	CHU00030831.10
1044.	CHU00030835.01	CHU00030835.09
1045.	CHU00030835.01	CHU00030835.09
1046.	CHU00030835.01	CHU00030835.09
1047.	CHU00030839.01	CHU00030839.05
1048.	CHU00030839.01	CHU00030839.05
1049.	CHU00030839.01	CHU00030839.05
1050.	CHU00030839.01	CHU00030839.05
1051.	CHU00030839.01	CHU00030839.05
1052.	CHU00030841.01	CHU00030841.04
1053.	CHU00030843.01	CHU00030843.09
1054.	CHU00030846.01	CHU00030846.13
1055.	CHU00030846.01	CHU00030846.13

1056.	CHU00030846.01	CHU00030846.13
1057.	CHU00030846.01	CHU00030846.13
1058.	CHU00030851.01	CHU00030851.04
1059.	CHU00030853.01	CHU00030853.04
1060.	CHU00030855.01	CHU00030855.31
1061.	CHU00030855.01	CHU00030855.31
1062.	CHU00030855.01	CHU00030855.31
1063.	CHU00030855.01	CHU00030855.31
1064.	CHU00030869.01	CHU00030869.09
1065.	CHU00030869.01	CHU00030869.09
1066.	CHU00030872.01	CHU00030872.09
1067.	CHU00030872.01	CHU00030872.09
1068.	CHU00030875.01	CHU00030875.05
1069.	CHU00030877.01	CHU00030877.05
1070.	CHU00030879.01	CHU00030879.05
1071.	CHU00030881.01	CHU00030881.09
1072.	CHU00030885	CHU00030886
1073.	CHU00030887.01	CHU00030887.03
1074.	CHU00030888.01	CHU00030888.17
1075.	CHU00030888.01	CHU00030888.17
1076.	CHU00030888.01	CHU00030888.17
1077.	CHU00030888.01	CHU00030888.17
1078.	CHU00030888.01	CHU00030888.17
1079.	CHU00030894.01	CHU00030894.03
1080.	CHU00030895.01	CHU00030895.11
1081.	CHU00030899.01	CHU00030899.13
1082.	CHU00030899.01	CHU00030899.13
1083.	CHU00030899.01	CHU00030899.13
1084.	CHU00030899.01	CHU00030899.13
1085.	CHU00030899.01	CHU00030899.13
1086.	CHU00030904.01	CHU00030904.14
1087.	CHU00030904.01	CHU00030904.14
1088.	CHU00030904.01	CHU00030904.14
1089.	CHU00030910.01	CHU00030910.06
1090.	CHU00030912.01	CHU00030912.11
1091.	CHU00030916.01	CHU00030916.03
1092.	CHU00030916.01	CHU00030916.03
1093.	CHU00030916.01	CHU00030916.03
1094.	CHU00030916.01	CHU00030916.03
1095.	CHU00030916.01	CHU00030916.03
1096.	CHU00030917.01	CHU00030917.09
1097.	CHU00030920.01	CHU00030920.06
1098.	CHU00030922.01	CHU00030922.38
1099.	CHU00030940.01	CHU00030940.04
1100.	CHU00030941.01	CHU00030941.08
1101.	CHU00030944.01	CHU00030944.05

1102.	CHU00030946.01	CHU00030946.06
1103.	CHU00030948.01	CHU00030948.09
1104.	CHU00030948.01	CHU00030948.09
1105.	CHU00030948.01	CHU00030948.09
1106.	CHU00030951.01	CHU00030951.05
1107.	CHU00030953.01	CHU00030953.09
1108.	CHU00030957.01	CHU00030957.07
1109.	CHU00030960.01	CHU00030960.09
1110.	CHU00030960.01	CHU00030960.09
1111.	CHU00030960.01	CHU00030960.09
1112.	CHU00030960.01	CHU00030960.09
1113.	CHU00030965	CHU00030970
1114.	CHU00030965.01	CHU00030965.14
1115.	CHU00030965.01	CHU00030965.14
1116.	CHU00030971.01	CHU00030971.05
1117.	CHU00030973.01	CHU00030973.08
1118.	CHU00030976.01	CHU00030976.09
1119.	CHU00030979.01	CHU00030979.13
1120.	CHU00030979.01	CHU00030979.13
1121.	CHU00030979.01	CHU00030979.13
1122.	CHU00030985	CHU00030990
1123.	CHU00030985	CHU00030990
1124.	CHU00030985.01	CHU00030985.14
1125.	CHU00030985.01	CHU00030985.14
1126.	CHU00030985.01	CHU00030985.14
1127.	CHU00030985.01	CHU00030985.14
1128.	CHU00030992	CHU00030994
1129.	CHU00030992	CHU00030994
1130.	CHU00030992.01	CHU00030992.08
1131.	CHU00030992.01	CHU00030992.08
1132.	CHU00030992.01	CHU00030992.08
1133.	CHU00030995.01	CHU00030995.08
1134.	CHU00030995.01	CHU00030995.08
1135.	CHU00030995.01	CHU00040995.08
1136.	CHU00030998	CHU00030998
1137.	CHU00030998	CHU00030998
1138.	CHU00030998.01	CHU00030998.02
1139.	CHU00030998.01	CHU00030998.02
1140.	CHU00030998.01	CHU00030998.02
1141.	CHU00030998.01	CHU00030998.02
1142.	CHU00030999.01	CHU00030999.08
1143.	CHU00031002.01	CHU00031002.10
1144.	CHU00031006	CHU00031009
1145.	CHU00031006	CHU00031009
1146.	CHU00031006.01	CHU00031006.11
1147.	CHU00031006.01	CHU00031006.11

1148.	CHU00031006.01	CHU00031006.11
1149.	CHU00031006.01	CHU00031006.11
1150.	CHU00031006.01	CHU00031006.11
1151.	CHU00031010	CHU00031012
1152.	CHU00031010	CHU00031012
1153.	CHU00031010.01	CHU00031010.08
1154.	CHU00031010.01	CHU00031010.08
1155.	CHU00031010.01	CHU00031010.08
1156.	CHU00031010.01	CHU00031010.08
1157.	CHU00031010.01	CHU00031010.08
1158.	CHU00031010.01	CHU00031010.08
1159.	CHU00031010.01	CHU00031010.08
1160.	CHU00031010.01	CHU00031010.08
1161.	CHU00031013.01	CHU00031013.05
1162.	CHU00031013.01	CHU00031013.05
1163.	CHU00031013.01	CHU00031013.05
1164.	CHU00031015	CHU00031016
1165.	CHU00031015	CHU00031016
1166.	CHU00031015.01	CHU00031015.04
1167.	CHU00031015.01	CHU00031015.04
1168.	CHU00031015.01	CHU00031015.04
1169.	CHU00031017.01	CHU00031017.02
1170.	CHU00031018.01	CHU00031018.08
1171.	CHU00031022.01	CHU00031022.05
1172.	CHU00031024.01	CHU00031024.05
1173.	CHU00031028.01	CHU00031028.07
1174.	CHU00031028.01	CHU00031028.07
1175.	CHU00031028.01	CHU00031028.07
1176.	CHU00031031.01	CHU00031031.03
1177.	CHU00031032.01	CHU00031032.11
1178.	CHU00031036.01	CHU00031036.06
1179.	CHU00031040.01	CHU00031040.09
1180.	CHU00031044.01	CHU00031044.08
1181.	CHU00031047.01	CHU00031047.09
1182.	CHU00031051.01	CHU00031051.14
1183.	CHU00031051.01	CHU00031051.14
1184.	CHU00031051.01	CHU00031051.14
1185.	CHU00031051.01	CHU00031051.14
1186.	CHU00031051.01	CHU00031051.14
1187.	CHU00031051.01	CHU00031051.14
1188.	CHU00031056.01	CHU00031056.24
1189.	CHU00031056.01	CHU00031056.24
1190.	CHU00031056.01	CHU00031056.24
1191.	CHU00031067.01	CHU00031067.07
1192.	CHU00031070.01	CHU00031070.13
1193.	CHU00031075.01	CHU00031075.28

1194.	CHU00031075.01	CHU00031075.28
1195.	CHU00031075.01	CHU00031075.28
1196.	CHU00031088.01	CHU00031088.10
1197.	CHU00031092.01	CHU00031092.06
1198.	CHU00031094.01	CHU00031094.04
1199.	CHU00031095.01	CHU00031095.04
1200.	CHU00031097	CHU00031097
1201.	CHU00031098.01	CHU00031098.04
1202.	CHU00031099	CHU00031100
1203.	CHU00031101.01	CHU00031101.09
1204.	CHU00031105.01	CHU00031105.06
1205.	CHU00031107.01	CHU00031107.08
1206.	CHU00031110.01	CHU00031110.02
1207.	CHU00031111.01	CHU00031111.06
1208.	CHU00031111.01	CHU00031111.06
1209.	CHU00031111.01	CHU00031111.06
1210.	CHU00031111.01	CHU00031111.06
1211.	CHU00031113.01	CHU00031113.05
1212.	CHU00031113.01	CHU00031113.05
1213.	CHU00031113.01	CHU00031113.05
1214.	CHU00031115.01	CHU00031115.04
1215.	CHU00031116.01	CHU00031116.02
1216.	CHU00031117.01	CHU00031117.05
1217.	CHU00031119.01	CHU00031119.04
1218.	CHU00031121.01	CHU00031121.02
1219.	CHU00031122.01	CHU00031122.03
1220.	CHU00031123.01	CHU00031123.08
1221.	CHU00031123.01	CHU00031123.08
1222.	CHU00031123.01	CHU00031123.08
1223.	CHU00031126.01	CHU00031126.07
1224.	CHU00031129.01	CHU00031129.10
1225.	CHU00031133.01	CHU00031133.03
1226.	CHU00031134.01	CHU00031134.03
1227.	CHU00031136	
1228.	CHU00031136.01	CHU00031136.03
1229.	CHU00031136.01	CHU00031136.03
1230.	CHU00031136.01	CHU00031136.03
1231.	CHU00031137.01	CHU00031137.02
1232.	CHU00031137.01	CHU00031137.02
1233.	CHU00031137.01	CHU00031137.02
1234.	CHU00031138	CHU00031139
1235.	CHU00031138	CHU00031139
1236.	CHU00031138.01	CHU00031138.04
1237.	CHU00031138.01	CHU00031138.04
1238.	CHU00031138.01	CHU00031138.04
1239.	CHU00031140.01	CHU00031140.03

1240.	CHU00031141.01	CHU00031141.03
1241.	CHU00031142.01	CHU00031142.15
1242.	CHU00031142.01	CHU00031142.15
1243.	CHU00031142.01	CHU00031142.15
1244.	CHU00031142.01	CHU00031142.15
1245.	CHU00031148.01	CHU00031148.05
1246.	CHU00031150.01	CHU00031150.08
1247.	CHU00031150.01	CHU00031150.08
1248.	CHU00031150.01	CHU00031150.08
1249.	CHU00031153.01	CHU00031153.03
1250.	CHU00031154.01	CHU00031154.03
1251.	CHU00031155.01	CHU00031155.09
1252.	CHU00031159.01	CHU00031159.05
1253.	CHU00031161.01	CHU00031161.05
1254.	CHU00031163.01	CHU00031163.07
1255.	CHU00031168.01	CHU00031168.03
1256.	CHU00031172.01	CHU00031172.06
1257.	CHU00031172.01	CHU00031172.06
1258.	CHU00031172.01	CHU00031172.06
1259.	CHU00031174.01	CHU00031174.06
1260.	CHU00031174.01	CHU00031174.06
1261.	CHU00031176	CHU00031176
1262.	CHU00031176	CHU00031176
1263.	CHU00031176.01	CHU00031176.03
1264.	CHU00031176.01	CHU00031176.03
1265.	CHU00031176.01	CHU00031176.03
1266.	CHU00031177.01	CHU00031177.03
1267.	CHU00031178.01	CHU00031178.06
1268.	CHU00031178.01	CHU00031178.06
1269.	CHU00031178.01	CHU00031178.06
1270.	CHU00031178.01	CHU00031178.06
1271.	CHU00031180.01	CHU00031180.05
1272.	CHU00031180.01	CHU00031180.05
1273.	CHU00031180.01	CHU00031180.05
1274.	CHU00031180.01	CHU00031180.05
1275.	CHU00031182.01	CHU00031182.03
1276.	CHU00031182.01	CHU00031182.03
1277.	CHU00031182.01	CHU00031182.03
1278.	CHU00031183.01	CHU00031183.08
1279.	CHU00031183.01	CHU00031183.08
1280.	CHU00031186.01	CHU00031186.06
1281.	CHU00031188.01	CHU00031188.06
1282.	CHU00031190.01	CHU00031190.10
1283.	CHU00031194.01	CHU00031194.19
1284.	CHU00031194.01	CHU00031194.19
1285.	CHU00031194.01	CHU00031194.19

1286.	CHU00031202.01	CHU00031202.16
1287.	CHU00031209.01	CHU00031209.12
1288.	CHU00031209.01	CHU00031209.12
1289.	CHU00031209.01	CHU00031209.12
1290.	CHU00031214.01	CHU00031214.16
1291.	CHU00031214.01	CHU00031214.16
1292.	CHU00031214.01	CHU00031214.16
1293.	CHU00031221.01	CHU00031221.15
1294.	CHU00031227.01	CHU00031227.12
1295.	CHU00031227.01	CHU00031227.12
1296.	CHU00031227.01	CHU00031227.12
1297.	CHU00031232.01	CHU00031232.14
1298.	CHU00031240	CHU00031240.18
1299.	CHU00031240.01	CHU00031240.18
1300.	CHU00031240.01	CHU00031240.18
1301.	CHU00031240.01	CHU00031240.18
1302.	CHU00031240.01	CHU00031240.18
1303.	CHU00031240.01	CHU00031240.18
1304.	CHU00031248.01	CHU00031248.04
1305.	CHU00031249.01	CHU00031249.09
1306.	CHU00031253.01	CHU00031253.03
1307.	CHU00031254.01	CHU00031254.03
1308.	CHU00031254.01	CHU00031254.03
1309.	CHU00031254.01	CHU00031254.03
1310.	CHU00031254.01	CHU00031254.03
1311.	CHU00031255.01	CHU00031255.15
1312.	CHU00031262	CHU00031267
1313.	CHU00031262.01	CHU00031262.14
1314.	CHU00031262.01	CHU00031262.14
1315.	CHU00031262.01	CHU00031262.14
1316.	CHU00031268.01	CHU00031268.04
1317.	CHU00031268.01	CHU00031268.04
1318.	CHU00031268.01	CHU00031268.04
1319.	CHU00031272.01	CHU00031272.06
1320.	CHU00031272.01	CHU00031272.06
1321.	CHU00031272.01	CHU00031272.06
1322.	CHU00031274.01	CHU00031274.10
1323.	CHU00031274.01	CHU00031274.10
1324.	CHU00031274.01	CHU00031274.10
1325.	CHU00031274.01	CHU00031274.10
1326.	CHU00031278.01	CHU00031278.03
1327.	CHU00031279.01	CHU00031279.11
1328.	CHU00031279.01	CHU00031279.11
1329.	CHU00031279.01	CHU00031279.11
1330.	CHU00031380.01	CHU00031380.06
1331.	CHU00031804.01	CHU00031804.04

1332.	CHU00031804.01	CHU00031804.04
1333.	CHU00031804.01	CHU00031804.04
1334.	CHU00031805.01	CHU00031805.06
1335.	CHU00031819.01	CHU00031819.04
1336.	CHU00031822	CHU00031822
1337.	CHU00031822	CHU00031822
1338.	CHU00031822.01	CHU00031822.03
1339.	CHU00031822.01	CHU00031822.03
1340.	CHU00031822.01	CHU00031822.03
1341.	CHU00032057.01	CHU00032057.05
1342.	CHU00032057.01	CHU00032057.05
1343.	CHU00032057.01	CHU00032057.05
1344.	CHU00032059.01	CHU00032059.04
1345.	CHU00032064.01	CHU00032064.08
1346.	CHU00032068.01	CHU00032068.05
1347.	CHU00032071.01	CHU00032071.05
1348.	CHU00032076.01	CHU00032076.05
1349.	CHU00032092.01	CHU00032092.03
1350.	CHU00032196.01	CHU00032196.04
1351.	CHU00032935	CHU00032991
1352.	CHU00032940.01	CHU00032940.23
1353.	CHU00032948.01	CHU00032948.23
1354.	CHU00032948.01	CHU00032948.23
1355.	CHU00033201	CHU00033202
1356.	CHU00033201	CHU00033202
1357.	CHU00033201	CHU00033202
1358.	CHU00033201	CHU00033202
1359.	CHU00033201.01	CHU00033201.06
1360.	CHU00033201.01	CHU00033201.06
1361.	CHU00033201.01	CHU00033201.06
1362.	CHU00033227	CHU00033228
1363.	CHU00033227	CHU00033228
1364.	CHU00033227.01	CHU00033227.06
1365.	CHU00033227.01	CHU00033227.06
1366.	CHU00033227.01	CHU00033227.06
1367.	CHU00033229.01	CHU00033229.03
1368.	CHU00033243	CHU00033243
1369.	CHU00034071	CHU00034071
1370.	CHU00035484	CHU00035525
1371.	CHU00036377	CHU00036419
1372.	CHU00036378.01	CHU00036378.08
1373.	CHU00036378.01	CHU00036378.08
1374.	CHU00036382.01	CHU00036382.05
1375.	CHU00036382.01	CHU00036382.05
1376.	CHU00036384.01	CHU00036384.05
1377.	CHU00036386.01	CHU00036386.05

1378.	CHU00036388.01	CHU00036388.06
1379.	CHU00036390.01	CHU00036390.05
1380.	CHU00036390.01	CHU00036390.05
1381.	CHU00036390.01	CHU00036390.05
1382.	CHU00036390.01	CHU00036390.05
1383.	CHU00036392.01	CHU00036392.05
1384.	CHU00036392.01	CHU00036392.05
1385.	CHU00036392.01	CHU00036392.05
1386.	CHU00036394.01	CHU00036394.06
1387.	CHU00036394.01	CHU00036394.06
1388.	CHU00036394.01	CHU00036394.06
1389.	CHU00036396.01	CHU00036396.06
1390.	CHU00036398.01	CHU00036398.10
1391.	CHU00036402.01	CHU00036402.06
1392.	CHU00036404.01	CHU00036404.05
1393.	CHU00036406.01	CHU00036406.05
1394.	CHU00036408.01	CHU00036408.06
1395.	CHU00036410.01	CHU00036410.05
1396.	CHU00036410.01	CHU00036410.05
1397.	CHU00036410.01	CHU00036410.05
1398.	CHU00036412.01	CHU00036412.05
1399.	CHU00036412.01	CHU00036412.05
1400.	CHU00036412.01	CHU00036412.05
1401.	CHU00036414	CHU00036415
1402.	CHU00036414	CHU00036415
1403.	CHU00036414.01	CHU00036414.05
1404.	CHU00036414.01	CHU00036414.05
1405.	CHU00036414.01	CHU00036414.05
1406.	CHU00036414.01	CHU00036414.05
1407.	CHU00036414.01	CHU00036414.05
1408.	CHU00036416.01	CHU00036416.08
1409.	CHU00038035	CHU00038097
1410.	CHU00039561	CHU00039761
1411.	CHU00039762	CHU00040515
1412.	CHU00039762	CHU00040515
1413.	CHU00040988	CHU00041361
1414.	CHU00040988	CHU00041361
1415.	CHU00040988	CHU00041361
1416.	CHU00040988	CHU00041361
1417.	CHU00041361	CHU00041361
1418.	CHU00042090	CHU00042175
1419.	CHU00042270	CHU00042270
1420.	CHU00045143	CHU00045150
1421.	CHU00046291	CHU00046295
1422.	CHU00047198	CHU00047199
1423.	CHU00047285	CHU00047287

1424.	CHU00047288	CHU00047477
1425.	CHU00047294	CHU00047657
1426.	CHU00047657	CHU00047657
1427.	CHU00047658	CHU00047662
1428.	CHU00047663	CHU00047674
1429.	CHU00048373	CHU00048765
1430.	CHU00050612	CHU00050613
1431.	CHU00051876	CHU00050613
1432.	CHU00051878	CHU00051881
1433.	CHU00052905	
1434.	CHU00057017	CHU00057028
1435.	CHU00057335	CHU00057349
1436.	CHU00057658	CHU00057671
1437.	CHU00059615	CHU00059627
1438.	CHU00063266	CHU00063277
1439.	CHU00066032	CHU00066064
1440.	CHU00066922	CHU00066922
1441.	CHU00069180	CHU00069190
1442.	CHU00071226	CHU00071279
1443.	CHU00071361	CHU00071397
1444.	CHU00071475.01	CHU00071475.04
1445.	CHU00071477.01	CHU00071477.06
1446.	CHU00071480.01	CHU00071480.06
1447.	CHU00071480.01	CHU00071480.06
1448.	CHU00072808	CHU00072819
1449.	CHU00075287	CHU00075323
1450.	CHU00075805	CHU00075841
1451.	CHU00078540	CHU00078556
1452.	CHU00078587	CHU00078600
1453.	CHU00079140	CHU00079168
1454.	CHU00080445	CHU00080458
1455.	CHU00080893	CHU00080897
1456.	CHU00081388	CHU00081395
1457.	CHU00081622	CHU00081623
1458.	CHU00081871	CHU00081880
1459.	CHU00082243	CHU00082243
1460.	CHU00082244	CHU00082286
1461.	CHU00082287	CHU00082291
1462.	CHU00082292	CHU00082295
1463.	CHU00087513	CHU00087523
1464.	CHU00088029	CHU00088039
1465.	CHU00088671	CHU00088683
1466.	CHU00089485	CHU00089486
1467.	CHU00089496	CHU00089496
1468.	CHU00089675	CHU00089676
1469.	CHU00090021	CHU00090025

1470.	CHU00091400	CHU00091401
1471.	CHU00093051	CHU00093080
1472.	CHU00093512	CHU00093519
1473.	CHU00094753	CHU00094755
1474.	CHU00094958	CHU00094961
1475.	CHU00095334	CHU00095335
1476.	CHU00095612	CHU00095617
1477.	CHU00099330.01	CHU00099330.08
1478.	CHU00100274	CHU00100275
1479.	CHU00100276	CHU00100275
1480.	CHU00100690	CHU00100690
1481.	CHU00100691	CHU00100692
1482.	CHU00102752.01	CHU00102752.10
1483.	CHU00102864.01	CHU00102864.05
1484.	CHU00102869	CHU00102869
1485.	CHU00104484	CHU00104487
1486.	CHU00105275	CHU00105304
1487.	CHU00105346	CHU00105347
1488.	CHU00105369	CHU00105370
1489.	CHU00105555	CHU00105558
1490.	CHU00106233	CHU00106292
1491.	CHU00106844	CHU00106865
1492.	CHU00108272	CHU00108276
1493.	CHU00109024	CHU00109053
1494.	CHU00117144	CHU00117147
1495.	CHU00117458	CHU00117460
1496.	CHU00118323	CHU00118339
1497.	CHU00118532	CHU00118339
1498.	CHU00119571.01	CHU00119571.08
1499.	CHU00119812	CHU00119822
1500.	CHU00119823	CHU00119849
1501.	CHU00120771.01	CHU00120771.11
1502.	CHU00121005	CHU00121050
1503.	CHU00121161	CHU00121192
1504.	CHU00121711	CHU00121716
1505.	CHU00121778	CHU00121778
1506.	CHU00121960	CHU00121962
1507.	CHU00122045	CHU00122053
1508.	CHU00122116	CHU00122123
1509.	CHU00122171	CHU00122191
1510.	CHU00122447	CHU00122459
1511.	CHU00122804	CHU00122831
1512.	CHU00122864	CHU00122904
1513.	CHU00123024	CHU00123067
1514.	CHU00123297	CHU00123302
1515.	CHU00123347.01	CHU00123347.04

1516.	CHU00123358.01	CHU00123358.09
1517.	CHU00123358.01	CHU00123358.09
1518.	CHU00123358.01	CHU00123358.09
1519.	CHU00123371.01	CHU00123371.09
1520.	CHU00123375.01	CHU00123375.09
1521.	CHU00123383.01	CHU00123383.08
1522.	CHU00123393.01	CHU00123393.10
1523.	CHU00123428.01	CHU00123428.09
1524.	CHU00123483.01	CHU00123483.07
1525.	CHU00123502	CHU00123517
1526.	CHU00123530	CHU00123530
1527.	CHU00123530.01	CHU00123530.05
1528.	CHU00123561.01	CHU00123561.05
1529.	CHU00123733.01	CHU00123733.02
1530.	CHU00123742	CHU00123742
1531.	CHU00123742.01	CHU00123742.09
1532.	CHU00123742.01	CHU00123742.09
1533.	CHU00123742.01	CHU00123742.09
1534.	CHU00123746.01	CHU00123746.05
1535.	CHU00124017.01	CHU00124017.08
1536.	CHU00124020.01	CHU00124020.05
1537.	CHU00124022.01	CHU00124022.05
1538.	CHU00124024.01	CHU00124024.08
1539.	CHU00124027.01	CHU00124027.08
1540.	CHU00124030.01	CHU00124030.08
1541.	CHU00124030.01	CHU00124030.08
1542.	CHU00124033.01	CHU00124033.05
1543.	CHU00124035	CHU00124038
1544.	CHU00124099	CHU00124102
1545.	CHU00124103	CHU00124109
1546.	CHU00124110	CHU00124115
1547.	CHU00124116.01	CHU00124116.08
1548.	CHU00124808	CHU00124818
1549.	CHU00124930	CHU00124981
1550.	CHU00124993.01	CHU00124993.05
1551.	CHU00125001.01	CHU00125001.11
1552.	CHU00125005	CHU00125008
1553.	CHU00125098	CHU00125110
1554.	CHU00125116	CHU00125125
1555.	CHU00125126	CHU00125138
1556.	CHU00125139	CHU00125140
1557.	CHU00125144	CHU00125145
1558.	CHU00125146	CHU00125156
1559.	CHU00125157	CHU00125161
1560.	CHU00125162.01	CHU00125162.15
1561.	CHU00125166	

1562.	CHU00125168	CHU00125170
1563.	CHU00125171	CHU00125180
1564.	CHU00125181.01	CHU00125181.08
1565.	CHU00125185	CHU00125189
1566.	CHU00125190.01	CHU00125190.05
1567.	CHU00125192.01	CHU00125192.08
1568.	CHU00125195	CHU00125198
1569.	CHU00125199	CHU00125206
1570.	CHU00125257	CHU00125292
1571.	CHU00125296	CHU00125373
1572.	CHU00125374	CHU00125399
1573.	CHU00125421.01	CHU00125421.05
1574.	CHU00125434.01	CHU00125434.08
1575.	CHU00125652.01	CHU00125652.05
1576.	CHU00125654.01	CHU00125654.02
1577.	CHU00125655.01	CHU00125655.05
1578.	CHU00125657.01	CHU00125657.05
1579.	CHU00125657.01	CHU00125657.05
1580.	CHU00125657.01	CHU00125657.05
1581.	CHU00125659.01	CHU00125659.04
1582.	CHU00125691	CHU00125698
1583.	CHU00125701.01	CHU00125701.04
1584.	CHU00125703	CHU00125709
1585.	CHU00125713.01	CHU00125713.04
1586.	CHU00125715	CHU00125721
1587.	CHU00125758	CHU00125764
1588.	CHU00125765	CHU00125770
1589.	CHU00125807	CHU00125812
1590.	CHU00125849	CHU00125858
1591.	CHU00125849	CHU00125858
1592.	CHU00125849	CHU00125858
1593.	CHU00125895	CHU00125899
1594.	CHU00125895	CHU00125899
1595.	CHU00125895	CHU00125899
1596.	CHU00125993	CHU00125997
1597.	CHU00126041.01	CHU00126041.08
1598.	CHU00126131.01	CHU00126131.06
1599.	CHU00126134	CHU00126157
1600.	CHU00126767	CHU00127208
1601.	CHU00129509	CHU00129524
1602.	CHU00136669	CHU00136678
1603.	CHU00149423	CHU00149451
1604.	CHU00154037	CHU00154420
1605.	CHU00154421	CHU00154454
1606.	CHU00167393	CHU00167420
1607.	CHU00167394	CHU00167420

1608.	CHU00168279	CHU00168497
1609.	CHU00169692	CHU00170262
1610.	CHU00172484	CHU00172857
1611.	CHU00179905	CHU00179950
1612.	CHU00188664	CHU00188830
1613.	CHU00188951	CHU00188964
1614.	CHU00191946	CHU00191966
1615.	CHU00193338	CHU00193343
1616.	CHU00207940	CHU00207963
1617.	CHU00217276	CHU00217371
1618.	CHU00247507	CHU00247507
1619.	CHU00250547	CHU00250599
1620.	CHU00250863	CHU00250865
1621.	CHU00269383.01	CHU00269383.05
1622.	CHU00281352	CHU00281923
1623.	CHU00286434	CHU00286469
1624.	CHU00288227	CHU00288304
1625.	CHU00288320	CHU00288352
1626.	CHU00288975	CHU00288992
1627.	CHU00289007	CHU00289013
1628.	CHU00289007	CHU00289013
1629.	CHU0028908	CHU0028908
1630.	CHU0028908	CHU0028908
1631.	CHU00289150	CHU00289201
1632.	CHU00289202	CHU00289216
1633.	CHU00291280	CHU00291308
1634.	CHU00295705	CHU00295844
1635.	CHU00296012	CHU00296155
1636.	CHU00297707	CHU00297883
1637.	CHU0030070.01	CHU0030070.02
1638.	CHU00303245	CHU00303797
1639.	CHU0030537.01	
1640.	CHU00311953	CHU00312120
1641.	CHU00312484	CHU00312883
1642.	CHU00318860	CHU00320934
1643.	CHU00325053	CHU00325053
1644.	CHU00331635	CHU00332557
1645.	CHU00338140	CHU00338153
1646.	CHU00358700	CHU00358700
1647.	CHU00363098.01	CHU00363098.09
1648.	CHU00363404	CHU00363405
1649.	CHU00363404	CHU00363405
1650.	CHU00363404	CHU00363405
1651.	CHU00363406	CHU00363439
1652.	CHU00363406	CHU00363439
1653.	CHU00363457	CHU00363467

1654.	CHU00363560	CHU00363566
1655.	CHU00364080	CHU00364080
1656.	CHU00372752	CHU00372754
1657.	CHU00373452	CHU00373475
1658.	CHU00373851	CHU00373853
1659.	CHU00374510	CHU00374515
1660.	CHU00375118.01	CHU00375118.08
1661.	CHU00375215	CHU00375238
1662.	CHU00376162	CHU00376162
1663.	CHU00376843.01	CHU00376843.06
1664.	CHU00377474	CHU00377476
1665.	CHU00378103	CHU00378126
1666.	CHU00379323	CHU00379325
1667.	CHU00380803	CHU00380827
1668.	CHU00381353	CHU00381356
1669.	CHU00382381	CHU00382404
1670.	CHU00382793	CHU00382816
1671.	CHU00382819	CHU00382820
1672.	CHU00384083	CHU00384085
1673.	CHU00385281	CHU00385282
1674.	CHU00386334	CHU00386337
1675.	CHU00386769	CHU00386775
1676.	CHU00388397	CHU00388397
1677.	CHU00391709	CHU00391712
1678.	CHU00391781	CHU00391817
1679.	CHU00392224	CHU00392241
1680.	CHU00392452	CHU00392454
1681.	CHU00393933	CHU00393934
1682.	CHU00395198	CHU00395207
1683.	CHU00401183	CHU00401183
1684.	CHU00402025	CHU00402030
1685.	CHU00403247	CHU00403283
1686.	CHU00406227	CHU00406260
1687.	CHU00407887	CHU00407894
1688.	CHU00413033	CHU00413066
1689.	CHU00414733	CHU00414738
1690.	CHU00414739	CHU00414739
1691.	CHU00414779	CHU00414780
1692.	CHU00415330	CHU00415336
1693.	CHU00416295	CHU00416298
1694.	CHU00416469	CHU00416472
1695.	CHU00416587	CHU00416590
1696.	CHU00416595	CHU00416597
1697.	CHU00417829	CHU00417835
1698.	CHU00417908	CHU00417909
1699.	CHU00418449	CHU00418450

1700.	CHU00419092	CHU00419096
1701.	CHU00419143	CHU00419157
1702.	CHU00419647	CHU00419647
1703.	CHU00419667	CHU00419669
1704.	CHU00420478	CHU00420483
1705.	CHU00421009	CHU00421024
1706.	CHU00421095	CHU00421101
1707.	CHU00421111	CHU00421153
1708.	CHU00421844	CHU00421873
1709.	CHU00437643	CHU00437668
1710.	CHU00438214	CHU00438218
1711.	CHU00442517	CHU00442518
1712.	CHU00453802	CHU00453831
1713.	CHU00454594	CHU00454596
1714.	CHU00457257	CHU00457257
1715.	CHU00457658	CHU00457717
1716.	CHU00468598	CHU00468627
1717.	CHU00473289	CHU00473318
1718.	CHU00475343	CHU00475358
1719.	CHU00477126	CHU00477131
1720.	CHU00477799	CHU00477799
1721.	CHU00478119	CHU00478123
1722.	CHU00478872	CHU00478896
1723.	CHU00479250	CHU00479253
1724.	CHU00484870	CHU00484894
1725.	CHU00485646	CHU00485666
1726.	CHU00485812	CHU00485816
1727.	CHU00488587	CHU00488588
1728.	CHU00491786	CHU00491810
1729.	CHU00492653	CHU00492656
1730.	CHU00492942	CHU00492949
1731.	CHU00492950	CHU00492950
1732.	CHU00494313	CHU00494318
1733.	CHU00498047	CHU00498106
1734.	CHU00499227	CHU00499256
1735.	CHU00499423	CHU00499424
1736.	CHU00500561	CHU00500569
1737.	CHU00500954	CHU00500980
1738.	CHU00500981	CHU00501007
1739.	CHU00501008	CHU00501034
1740.	CHU00502432	CHU00502432
1741.	CHU00507050	CHU00507079
1742.	CHU00507374	CHU00507375
1743.	CHU00513751	CHU00513751
1744.	CHU00513829	CHU00513858
1745.	CHU00515366	CHU00515395

1746.	CHU00516814	CHU00516814
1747.	CHU00524129	CHU00524158
1748.	CHU00524991	CHU00524991
1749.	CHU00524992	CHU00525020
1750.	CHU00529073	CHU00529101
1751.	CHU00530288	CHU00530294
1752.	CHU00530295	CHU00530295
1753.	CHU00532295	CHU00532305
1754.	CHU00532449	CHU00532454
1755.	CHU00532951	CHU00532951
1756.	CHU00532952	CHU00532955
1757.	CHU00535641	CHU00535664
1758.	CHU00540552	CHU00540552
1759.	CHU00544751	CHU00544755
1760.	CHU00545253	CHU00545257
1761.	CHU00545730	CHU00545733
1762.	CHU00545795	CHU00545798
1763.	CHU00547474	CHU00547503
1764.	CHU00548418	CHU00548422
1765.	CHU00548450	CHU00548793
1766.	CHU00549116	CHU00549124
1767.	CHU00549433	CHU00549453
1768.	CHU00550362	CHU00550367
1769.	CHU00550688	CHU00550712
1770.	CHU00550744	CHU00550749
1771.	CHU00550897	CHU00550900
1772.	CHU00553887	CHU00553887
1773.	CHU00555106	CHU00555107
1774.	CHU00571826	CHU00571833
1775.	CHU00571975	CHU00572019
1776.	CHU00573812	CHU00573812
1777.	CHU00573814	CHU00573820
1778.	CHU00574405	CHU00574429
1779.	CHU00576066	CHU00576069
1780.	CHU00578883.01	CHU00578883.08
1781.	CHU00578883.01	CHU00578883.08
1782.	CHU00578883.01	CHU00578883.08
1783.	CHU00578883.01	CHU00578883.08
1784.	CHU00578887.01	CHU00578887.08
1785.	CHU00597476.01	CHU00597476.10
1786.	CHU00597733	CHU00597733
1787.	CHU00597905	CHU00597912
1788.	CHU00597922	CHU00597925
1789.	CHU00598215	CHU00598217
1790.	CHU00598215	CHU00598217
1791.	CHU00599326	CHU00599331

1792.	CHU00604900	CHU00604904
1793.	CHU00605846	CHU00605866
1794.	CHU00606750	CHU00606752
1795.	CHU00607654.01	CHU00607654.08
1796.	CHU00607732	CHU00607735
1797.	CHU00607732	CHU00607735
1798.	CHU00607732.01	CHU00607732.09
1799.	CHU00607732.01	CHU00607732.09
1800.	CHU00607732.01	CHU00607732.09
1801.	CHU00608095.01	CHU00608095.24
1802.	CHU00608095.01	CHU00608095.24
1803.	CHU00608095.01	CHU00608095.24
1804.	CHU00608183.01	CHU00608183.03
1805.	CHU00608188.01	CHU00608188.03
1806.	CHU00608395	CHU00608398
1807.	CHU00608743	CHU00608745
1808.	CHU00611605	CHU00611617
1809.	CHU00615130	CHU00615144
1810.	CHU00615145	CHU00615162
1811.	CHU00615163	CHU00615180
1812.	CHU00615181	CHU00615203
1813.	CHU00615712	CHU00615719
1814.	CHU00616369.01	CHU00616369.07
1815.	CHU00617129	CHU00617180
1816.	CHU00617790	CHU00617823
1817.	CHU00618335	CHU00618346
1818.	CHU00624682.01	CHU00624682.02
1819.	CHU00624682.01	CHU00624682.02
1820.	CHU00628064	CHU00628065
1821.	CHU00628469	CHU00628526
1822.	CHU00628470	CHU00628526
1823.	CHU00628866	CHU00628871
1824.	CHU00628898	CHU00628952
1825.	CHU00629335	CHU00629335
1826.	CHU00629834	CHU00629835
1827.	CHU00631432	CHU00631432
1828.	CHU00631433	CHU00631433
1829.	CHU00631434	CHU00631437
1830.	CHU00631948	CHU00631949
1831.	CHU00632020	CHU00632025
1832.	CHU00632021	CHU00632025
1833.	CHU00632268	CHU00632288
1834.	CHU00632378	CHU00632419
1835.	CHU00632463	CHU00632463
1836.	CHU00632846	CHU00632849
1837.	CHU00633824	CHU00633826

1838.	CHU00633902	CHU00633904
1839.	CHU00633905	CHU00633909
1840.	CHU00633905	CHU00633909
1841.	CHU00633905	CHU00633909
1842.	CHU00633978	CHU00633982
1843.	CHU00634479	CHU00634481
1844.	CHU00634491	CHU00634493
1845.	CHU00634498	CHU00634534
1846.	CHU00634866	CHU00634867
1847.	CHU00635046	CHU00635076
1848.	CHU00635116	CHU00635116
1849.	CHU00636140	CHU00636150
1850.	CHU00636165	CHU00636166
1851.	CHU00636931	CHU00636932
1852.	CHU00636931	CHU00636932
1853.	CHU00636931	CHU00636932
1854.	CHU00636933	CHU00636965
1855.	CHU00636933	CHU00636965
1856.	CHU00637123	CHU00637123
1857.	CHU00637123	CHU00637123
1858.	CHU00637157	CHU00637157
1859.	CHU00637157	CHU00637157
1860.	CHU00637158	CHU00637181
1861.	CHU00637563	CHU00637565
1862.	CHU00637563	CHU00637565
1863.	CHU00637563	CHU00637565
1864.	CHU00637566	CHU00637586
1865.	CHU00637566	CHU00637586
1866.	CHU00637619	CHU00637619
1867.	CHU00637619	CHU00637619
1868.	CHU00637620	CHU00637656
1869.	CHU00637620	CHU00637656
1870.	CHU00638344	CHU00638344
1871.	CHU00638344	CHU00638344
1872.	CHU00638344	CHU00638344
1873.	CHU00638694	CHU00638694
1874.	CHU00639514	CHU00639522
1875.	CHU00639515	CHU00639522
1876.	CHU00642834	CHU00642835
1877.	CHU00644514	CHU00644605
1878.	CHU00644987	CHU00644987
1879.	CHU00644987	CHU00644987
1880.	CHU00644987	CHU00644987
1881.	CHU00644988	CHU00644994
1882.	CHU00644988	CHU00644994
1883.	CHU00645156	CHU00645156

1884.	CHU00645156	CHU00645156
1885.	CHU00645156	CHU00645156
1886.	CHU00645157	CHU00645157
1887.	CHU00645176	CHU00645176
1888.	CHU00645176	CHU00645176
1889.	CHU00645177	CHU00645209
1890.	CHU00645177	CHU00645209
1891.	CHU00646019	CHU00646019
1892.	CHU00646035	CHU00646036
1893.	CHU00646035	CHU00646036
1894.	CHU00646035	CHU00646036
1895.	CHU00646093	CHU00646110
1896.	CHU00646655	CHU00646655
1897.	CHU00646730	CHU00646731
1898.	CHU00646730	CHU00646731
1899.	CHU00646732	CHU00646767
1900.	CHU00646732	CHU00646767
1901.	CHU00646768	CHU00646769
1902.	CHU00646803	CHU00646803
1903.	CHU00647102	CHU00647103
1904.	CHU00647104	CHU00647137
1905.	CHU00647932	CHU00647943
1906.	CHU00647932	CHU00647943
1907.	CHU00648024	CHU00648025
1908.	CHU00648024	CHU00648025
1909.	CHU00648029	CHU00648029
1910.	CHU00648741	CHU00648741
1911.	CHU00648741	CHU00648741
1912.	CHU00648816	CHU00648816
1913.	CHU00648816	CHU00648816
1914.	CHU00648817	CHU00648817
1915.	CHU00648817	CHU00648817
1916.	CHU00648818	CHU00648819
1917.	CHU00648818	CHU00648819
1918.	CHU00649136	CHU00649136
1919.	CHU00649654	CHU00649657
1920.	CHU00649654	CHU00649657
1921.	CHU00649658	CHU00649659
1922.	CHU00649675	CHU00649675
1923.	CHU00649676	CHU00649676
1924.	CHU00651590	CHU00651590
1925.	CHU00651590	CHU00651590
1926.	CHU00653029	CHU00653029
1927.	CHU00653030	CHU00653225
1928.	CHU00654437	CHU00654438
1929.	CHU00654870	CHU00654872

60836739.1

43

1930.	CHU00655716	CHU00655717
1931.	CHU00655718	CHU00655719
1932.	CHU00655800	CHU00655815
1933.	CHU00656174	CHU00656198
1934.	CHU00656174	CHU00656198
1935.	CHU00656459	CHU00656462
1936.	CHU00657379	CHU00657444
1937.	CHU00658438	CHU00658566
1938.	CHU00659413	CHU00659444
1939.	CHU00659671	CHU00659698
1940.	CHU00660173.01	CHU00660173.08
1941.	CHU00660181	CHU00660183
1942.	CHU00660194.01	CHU00660194.08
1943.	CHU00660198.01	CHU00660198.04
1944.	CHU00660198.01	CHU00660198.04
1945.	CHU00660200.01	CHU00660200.04
1946.	CHU00660202.01	CHU00660202.06
1947.	CHU00660209.01	CHU00660209.08
1948.	CHU00660213.01	CHU00660213.08
1949.	CHU00660213.01	CHU00660213.08
1950.	CHU00660217.01	CHU00660217.08
1951.	CHU00660217.01	CHU00660217.08
1952.	CHU00660221.01	CHU00660221.04
1953.	CHU00660223.01	CHU00660223.04
1954.	CHU00660225.01	CHU00660225.10
1955.	CHU00660235.01	CHU00660235.08
1956.	CHU00660239.01	CHU00660239.09
1957.	CHU00660243.01	CHU00660243.08
1958.	CHU00660247.01	CHU00660247.08
1959.	CHU00660298	CHU00660301
1960.	CHU00660298	CHU00660301
1961.	CHU00660306	CHU00660311
1962.	CHU00660306	CHU00660311
1963.	CHU00660306	CHU00660311
1964.	CHU00660324	CHU00660328
1965.	CHU00660334	CHU00660336
1966.	CHU00660337	CHU00660340
1967.	CHU00660337	CHU00660340
1968.	CHU00660337	CHU00660340
1969.	CHU00660350	CHU00660352
1970.	CHU00660363	CHU00660365
1971.	CHU00660366.01	CHU00660366.06
1972.	CHU00660366.01	CHU00660366.06
1973.	CHU00660366.01	CHU00660366.06
1974.	CHU00660369	CHU00660371
1975.	CHU00660373	CHU00660382

1976.	CHU00660373	CHU00660382
1977.	CHU00660383	CHU00660394
1978.	CHU00660383	CHU00660394
1979.	CHU00660383	CHU00660394
1980.	CHU00660395	CHU00660407
1981.	CHU00660395	CHU00660407
1982.	CHU00660408	CHU00660418
1983.	CHU00660408	CHU00660418
1984.	CHU00660408	CHU00660418
1985.	CHU00660408	CHU00660418
1986.	CHU00660408	CHU00660418
1987.	CHU00660419	CHU00660425
1988.	CHU00660426	CHU00660435
1989.	CHU00660426	CHU00660435
1990.	CHU00660436	CHU00660445
1991.	CHU00660446	CHU00660453
1992.	CHU00660454	CHU00660463
1993.	CHU00660454	CHU00660463
1994.	CHU00660464	CHU00660467
1995.	CHU00660476	CHU00660486
1996.	CHU00660487	CHU00660500
1997.	CHU00660487	CHU00660500
1998.	CHU00660501	CHU00660514
1999.	CHU00660515	CHU00660522
2000.	CHU00660523	CHU00660532
2001.	CHU00660539	CHU00660548
2002.	CHU00660549	CHU00660560
2003.	CHU00660561	CHU00660574
2004.	CHU00660575	CHU00660585
2005.	CHU00660586	CHU00660593
2006.	CHU00660594	CHU00660605
2007.	CHU00660606	CHU00660615
2008.	CHU00660606	CHU00660615
2009.	CHU00660616	CHU00660625
2010.	CHU00660626	CHU00660632
2011.	CHU00660626	CHU00660632
2012.	CHU00660626	CHU00660632
2013.	CHU00660643	CHU00660651
2014.	CHU00660656	CHU00660661
2015.	CHU00660662	CHU00660670
2016.	CHU00660671	CHU00660680
2017.	CHU00660671	CHU00660680
2018.	CHU00660671	CHU00660680
2019.	CHU00660671	CHU00660680
2020.	CHU00660671	CHU00660680
2021.	CHU00660671	CHU00660680

2022.	CHU00660681	CHU00660692
2023.	CHU00660693	CHU00660698
2024.	CHU00660699	CHU00660708
2025.	CHU00660699	CHU00660708
2026.	CHU00660709	CHU00660716
2027.	CHU00660709	CHU00660716
2028.	CHU00660717	CHU00660727
2029.	CHU00660717	CHU00660727
2030.	CHU00660717	CHU00660727
2031.	CHU00660717	CHU00660727
2032.	CHU00660728	CHU00660735
2033.	CHU00660728	CHU00660735
2034.	CHU00660741	CHU00660745
2035.	CHU00661917	CHU00661928
2036.	CHU00673036	CHU00673057
2037.	CHU00673063	CHU00673076
2038.	CHU00678247	CHU00678254
2039.	CHU00678534	CHU00678543
2040.	CHU00678641	CHU00678678
2041.	CHU00678718	CHU00678752
2042.	CHU00678718	CHU00678752
2043.	CHU00678718	CHU00678752
2044.	CHU00678938	CHU00678961
2045.	CHU00681869	CHU00681870
2046.	CHU00682158	CHU00682163
2047.	CHU00682227	CHU00682251
2048.	CHU00682979	CHU00682980
2049.	CHU00688567	CHU00688580
2050.	CHU00689347	CHU00689373
2051.	CHU00693069	CHU00693074
2052.	CHU00693080	CHU00693098
2053.	CHU00700074	CHU00700142
2054.	CHU00701090	CHU00701152
2055.	CHU00702164	CHU00702225
2056.	CHU00703429	CHU00703491
2057.	CHU00703539	CHU00703601
2058.	CHU00706329	CHU00706334
2059.	CHU00709827	CHU00709888
2060.	CHU00709991	CHU00709995
2061.	CHU00718308	CHU00718313
2062.	CHU00718839	CHU00718857
2063.	CHU00719935	CHU00719997
2064.	CHU00722454	CHU00722461
2065.	CHU00725669.01	CHU00725669.08
2066.	CHU00725774.01	CHU00725774.17
2067.	CHU00725833.01	CHU00725833.08

2068.	CHU00732798.01	CHU00732798.06
2069.	CHU00732816.01	CHU00732816.06
2070.	CHU00732831.01	CHU00732831.10
2071.	CHU00732831.01	CHU00732831.10
2072.	CHU00734324	CHU00734327
2073.	CHU00734336	CHU00734337
2074.	CHU00734349	CHU00734349
2075.	CHU00734351	CHU00734351
2076.	CHU00734728.01	CHU00734728.02
2077.	CHU00734954	CHU00734957
2078.	CHU00735065	CHU00735065
2079.	CHU00735065	CHU00735065
2080.	CHU00735065	CHU00735065
2081.	CHU00735066	CHU00735066
2082.	CHU00735068	CHU00735069
2083.	CHU00735068	CHU00735069
2084.	CHU00735070	CHU00735105
2085.	CHU00735070	CHU00735105
2086.	CHU00735143	CHU00735143
2087.	CHU00735180	CHU00735181
2088.	CHU00735249	CHU00735249
2089.	CHU00735249	CHU00735249
2090.	CHU00735249	CHU00735249
2091.	CHU00735250	CHU00735250
2092.	CHU00735251	CHU00735252
2093.	CHU00735251	CHU00735252
2094.	CHU00735251	CHU00735252
2095.	CHU00735253	CHU00735255
2096.	CHU00735256	CHU00735256
2097.	CHU00735283	CHU00735286
2098.	CHU00735283	CHU00735286
2099.	CHU00735287	CHU00735290
2100.	CHU00735291	CHU00735294
2101.	CHU00735295	CHU00735297
2102.	CHU00735298	CHU00735298
2103.	CHU00735299	CHU00735312
2104.	CHU00735375.01	CHU00735375.06
2105.	CHU00735375.01	CHU00735375.06
2106.	CHU00735380.01	CHU00735380.14
2107.	CHU00735387	CHU00735619
2108.	CHU00848029	
2109.	CHU0660643	CHU00660651
2110.	CHWA00000001	CHWA00000001
2111.	CHWA00000002	CHWA00000002
2112.	CHWA00000003	CHWA00000003
2113.	CHWA00000004	CHWA00000004

2114.	CHWA00000005	CHWA00000005
2115.	CHWA00000006	CHWA00000006
2116.	CHWA00000007	CHWA00000007
2117.	CHWA00000008	CHWA00000008
2118.	CHWA00000009	CHWA00000009
2119.	CHWA00000010	CHWA00000010
2120.	CHWA00000011	CHWA00000011
2121.	CHWA00000012	CHWA00000012
2122.	CHWA00000013	CHWA00000013
2123.	CHWA00000014	CHWA00000014
2124.	CHWA00000140	CHWA00000152
2125.	CHWA00006416	CHWA00006426
2126.	CHWA00010117	CHWA00010240
2127.	CHWA00011550	CHWA00012827
2128.	CHWA00015235	CHWA00016204
2129.	CHWA00017020	CHWA00017944
2130.	CHWA00029907	CHWA00029976
2131.	CHWA00031589	CHWA00031589
2132.	CHWA00032001	CHWA00032020
2133.	CHWA00032115	CHWA00032128
2134.	CHWA00042517	CHWA00042616
2135.	CHWA00048095	CHWA00048122
2136.	CHWA00052613	CHWA00052845
2137.	CHWA00062147	CHWA00062569
2138.	CHWA00069568	CHWA00069593
2139.	CHWA00070981	CHWA00071036
2140.	CHWA00088192	CHWA00088762
2141.	CHWA00106460	CHWA00106757
2142.	CHWA00123560	CHWA00123572
2143.	CHWA00129231	CHWA00129308
2144.	CHWA00129721	CHWA00129903
2145.	CHWA00145996	CHWA00146079
2146.	CHWA00193711	CHWA00193717
2147.	CHWA00195847	CHWA00196029
2148.	CHWA00197071	CHWA00197269
2149.	CHWA00216343	CHWA00216376
2150.	CHWA00225304	CHWA00225320
2151.	CHWA00225321	CHWA00225356
2152.	CHWA00225357	CHWA00225418
2153.	CHWA00225376	CHWA00225464
2154.	CHWA00225402	CHWA00225512
2155.	CHWA00225419	CHWA00225547
2156.	CHWA00225447	CHWA00225596
2157.	CHWA00225465	CHWA00225634
2158.	CHWA00225485	CHWA00225688
2159.	CHWA00225513	CHWA00225734


2160.	CHWA00225530	CHWA00225824
2161.	CHWA00225548	CHWA00225907
2162.	CHWA00225581	CHWA00225969
2163.	CHWA00225597	CHWA00226019
2164.	CHWA00225612	CHWA00226055
2165.	CHWA00225635	CHWA00226131
2166.	CHWA00225663	CHWA00226188
2167.	CHWA00225689	CHWA00226235
2168.	CHWA00225707	CHWA00225356
2169.	CHWA00225735	CHWA00225401
2170.	CHWA00225766	CHWA00225446
2171.	CHWA00225825	CHWA00225484
2172.	CHWA00225848	CHWA00225529
2173.	CHWA00225908	CHWA00225580
2174.	CHWA00225931	CHWA00225611
2175.	CHWA00225970	CHWA00225662
2176.	CHWA00225988	CHWA00225706
2177.	CHWA00226020	CHWA00225765
2178.	CHWA00226040	CHWA00225847
2179.	CHWA00226056	CHWA00225930
2180.	CHWA00226082	CHWA00225987
2181.	CHWA00226132	CHWA00226039
2182.	CHWA00226162	CHWA00226081
2183.	CHWA00226189	CHWA00226161
2184.	CHWA00226208	CHWA00226207
2185.	CHWA00226236	CHWA00226269
2186.	CHWA00239086	CHWA00239094
2187.	CHWA00242220	CHWA00242231
2188.	CHWA00248458	CHWA00248591
2189.	CHWA00252447	CHWA00252570
2190.	CHWA00253374	CHWA00253432
2191.	CHWA00253493	CHWA00253643
2192.	CHWA00253494	CHWA00253585
2193.	CHWA00256934	CHWA00256934
2194.	CHWA00256935	CHWA00256935
2195.	CHWA002569356	
2196.	CHWA002569357	
2197.	CHWA00256936	CHWA00256936
2198.	CHWA00256937	CHWA00256937

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss.

On August 1, 2014, I served the foregoing documents described as **DIRECT ACTION PLAINTIFFS' AND INDIRECT ACTION PLAINTIFFS' FIRST SET OF REQUESTS FOR ADMISSION TO CHUNGHWA PICTURE TUBES, LTD. AND CHUNGHWA PICTURE TUBES (MALAYSIA)** on the interested parties in this action by placing a true and correct copy thereof enclosed in a sealed envelope addressed as follows:

I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

[X] (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction service was made.


La Donna Bryant-Wilson

SERVICE LIST

<p>Philip J. Iovieno Anne M. Nardacci BOIES, SCHILLER & FLEXNER LLP 30 South Pearl Street, 11th Floor Albany, NY 12207 Telephone: (518) 434-0600 Facsimile: (518) 434-0665 Email: piovieno@bsfllp.com anardacci@bsfllp.com</p> <p><i>Liaison Counsel for Direct Action Plaintiffs and Attorneys for Plaintiffs Electrograph Systems, Inc., Electrograph Technologies, Corp., Office Depot, Inc., Compucom Systems, Inc., Interbond Corporation of America, P.C. Richard & Son Long Island Corporation, Marta Cooperative of America, Inc., ABC Appliance, Inc., Schultze Agency Services LLC on behalf of Tweeter Opco, LLC and Tweeter Newco, LLC</i></p>	<p>Kamala D. Harris Attorney General of California Mark Breckler Chief Assistant Attorney General Kathleen E. Foote Senior Assistant Attorney General Emilio E. Varanini Deputy Attorney General Attorney General's Office State of California Department of Justice 455 Golden Gate Avenue, Suite 11000 San Francisco, CA 94102 Tel: 415-703-5908 Fax: 415-703-5480 Email: emilio.varanini@doj.ca.gov</p> <p><i>Counsel for Plaintiff State of California</i></p>
<p>Mario N. Alioto Lauren Capurro TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP 2280 Union Street San Francisco, CA 94123 Tel: 415-563-7200 Fax: 415-346-0679 Email: malioto@tatp.com lauren russell@tatp.com</p> <p><i>Lead Counsel for Indirect Purchaser Plaintiffs</i></p>	<p>Guido Saveri R. Alexander Saveri SAVERI & SAVERI, INC. 706 Sansome Street San Francisco CA 94111 Tel: 415-217-6810 Fax: 415-217-6813 Email: guido@saveri.com rick@saveri.com</p> <p><i>Interim Lead Counsel for Direct Purchaser Plaintiffs</i></p>

Jeffrey L. Kessler
Jennifer M. Stewart
A. Paul Victor
Eva W. Cole
Molly M. Donovan
WINSTON & STRAWN LLP
200 Park Avenue
New York, NY 10166
Tel: 212-294-4692
Fax: 212-294-4700
Email: jkessler@winston.com
jstewart@winston.com
pvictor@winston.com
ewcole@winston.com
mmdonovan@winston.com

Martin C. Geagan
WINSTON & STRAWN LLP
200 Park Avenue
New York, New York 10166
Tel: 212-294-4615
Fax: 212-294-4700
E-mail: mgeagan@winston.com

Matthew R. DalSanto
WINSTON & STRAWN LLP
35 West Wacker Drive
Chicago, IL 60601
Tel: 312-558-6211
Fax: 312-558-5700
E-mail: mdalsanto@winston.com

*Counsel for Panasonic Corporation;
Panasonic Corporation of North America; and
MT Picture Display Co., Ltd.*

Steven A. Reiss
David L. Yohai
David Yolkut
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, NY 10153-0119
Tel: 212-310-8000
Fax: 212-310-8007
Email: steven.reiss@weil.com
david.yohai@weil.com
david.yolkut@weil.com

Bambo Obaro
WEIL, GOTSHAL & MANGES LLP
201 Redwood Shores Parkway
Redwood Shores, CA 94065-1175
Tel: (650) 802-3000
Fax: (650) 802-3100
Email: bambo.obaro@weil.com

Craig Y. Allison
BUNSOW DE MORY, SMITH & ALLISON
LLP
600 Allerton Street, Suite 101
Redwood City, CA 94063
Tel: (650) 351-7248
Fax: (650) 351-7253
Email: callison@bdiplaw.com

Amy Lee Stewart
E-mail: astewart@roselawfirm.com

*Counsel for Panasonic Corporation;
Panasonic Corporation of North America;
and MT Picture Display Co., Ltd.*

<p>1 Eliot A. Adelson 2 James Maxwell Cooper 3 KIRKLAND & ELLIS LLP 4 555 California Street, 27th Floor 5 San Francisco, CA 94104 6 Tel: 415-439-1400 7 Fax: 415-439-15001 8 Email: eliot.adelson@kirkland.com 9 max.cooper@kirkland.com</p> <p>10 James H. Mutchnik 11 Kate Wheaton 12 KIRKLAND & ELLIS LLP 13 300 North LaSalle 14 Chicago, IL 60654 15 Tel: 312-862-2000 16 Fax: 312-862-2200 17 Email: james.mutchnik@kirkland.com 18 kate.wheaton@kirkland.com</p> <p>19 <i>Counsel for Hitachi, Ltd.; Hitachi Displays,</i> 20 <i>Ltd.; Hitachi America, Ltd.; Hitachi Asia, Ltd.;</i> 21 <i>and Hitachi Electronic Devices (USA), Inc.</i></p>	<p>Joel S. Sanders Rachel S. Brass Christine A. Fujita GIBSON, DUNN & CRUTCHER LLP 555 Mission Street, Suite 3000 San Francisco, CA 94105 Tel: 415-393-8200 Fax: 415-393-8206 Email: jsanders@gibsondunn.com rbrass@gibsondunn.com cfujita@gibsondunn.com</p> <p><i>Counsel for Chunghwa Picture Tubes, Ltd.</i> <i>and Chunghwa Picture Tubes (Malaysia)</i></p>
<p>22 Christopher M. Curran 23 Lucius B. Lau 24 Charise Naifeh 25 Dana Foster 26 WHITE & CASE 27 701 Thirteenth Street N.W. 28 Washington, DC 20005 Tel: 202-626-3600 Fax: 202-639-9355 Email: ccurran@whitecase.com alau@whitecase.com cnaifeh@whitecase.com dfoster@whitecase.com</p> <p><i>Counsel for Toshiba Corporation; Toshiba</i> <i>America, Inc.; Toshiba America Consumer</i> <i>Products, L.L.C.; Toshiba America Electronics</i> <i>Components, Inc.; Toshiba America</i> <i>Information Systems, Inc.</i></p>	<p>William Temko Jonathan Altman Hojoon Hwang Laura Lin MUNGER, TOLLES & OLSON LLP 560 Mission Street San Francisco, CA 94105 Tel: 415-512-4009 Fax: 415-512-4077 Email: william.temko@mto.com jonathan.altman@mto.com hojoon.hwang@mto.com laura.lin@mto.com</p> <p><i>Counsel for LG Electronics, Inc.; LG</i> <i>Electronics USA, Inc.</i></p>

<p>John M. Taladay Erik Koons Charles Malaise BAKER BOTTS L.L.P. 1299 Pennsylvania Avenue, N.W. Washington, DC 20004-2400 Tel: 202-639-7700 Fax: 202-639-7890 Email: john.taladay@bakerbotts.com erik.koons@bakerbotts.com charles.malaise@bakerbotts.com</p> <p>Jon V. Swenson Baker Botts L.L.P. 620 Hansen Way Palo Alto, CA 94304 Tel: 650-739-7500 Fax: 650-739-7699 Email: jon.swenson@bakerbotts.com</p> <p><i>Counsel for Koninklijke Philips Electronics N.V. and Philips Electronics North America Corporation</i></p>	<p>Christine Laciak Richard Snyder FRESHFIELDS BRUCKHAUS & DERINGER US, LLP 700 13th Street, NW, 10th Floor Washington, DC 20005 Tel: (202) 777-4500 Email: christine.laciak@freshfields.com richard.snyder@freshfields.com</p> <p><i>Counsel for Defendant Beijing Matsushita Color CRT Co., Ltd.</i></p>
<p>Joseph R. Tiffany, II PILLSBURY WINTHROP SHAW PITTMAN, LLP 2550 Hanover Street Palo Alto, CA 94304-1114 Telephone: (650) 233-4644 Facsimile: (650) 233-4545 Email: joseph.tiffany@pillsburylaw.com</p> <p><i>Counsel for Defendants IRICO Display Devices Co., Ltd.; IRICO Group Corporation; IRICO Group Electronics Co., Ltd.</i></p>	<p>Michael R. Lazerwitz CLEARY GOTTLLIEG STEEN & HAMPTON LLP 2000 Pennsylvania Avenue, NW, Suite 9000 Washington, DC 20006 Telephone: (202) 974-1500 Facsimile: (202) 974-1999 Email: mlazerwitz@cgsh.com</p> <p><i>Counsel for Defendant LP Displays International, Ltd.</i></p>

Gary L. Halling
James L. McGinnis
Michael W. Scarborough
SHEPPARD MULLIN RICHTER &
HAMPTON LLP
Four Embarcadero Center, 17th Floor
San Francisco, CA 94111-4106
Tel: 415-434-9100
Fax: 415-434-3947
Email: jmcginnis@sheppardmullin.com
mscarborough@sheppardmullin.com
dballard@sheppardmullin.com

Leo D. Caseria
SHEPPARD MULLIN RICHTER &
HAMPTON LLP
333 South Hope Street, 43rd Floor
Los Angeles, California 90071-1448
Telephone: 213-620-1780
Fax: 213-620-1398
E-mail: lcaseria@sheppardmullin.com

Bruce Cobath
SHEPPARD MULLIN RICHTER &
HAMPTON LLP
30 Rockefeller Plaza, 39th Floor
New York, NY 10112
Tel: 212-653-8700
E-mail: bcolbath@sheppardmullin.com

*Counsel for Samsung SDI Co., Ltd.; Samsung
SDI America, Inc.; SDI Mexico S.A. de C.V.;
Samsung SDI Brasil Ltda.; Shenzhen Samsung
SDI Co., Ltd.; Tianjin Samsung SDI Co., Ltd.;
and Samsung SDI (Malaysia) Sdn. Bhd.*

Brent Caslin
JENNER & BLOCK LLP
633 West 5th Street, Suite 3600
Los Angeles, CA 90071-2054
Tel: (213) 239-5100
Fax: (213) 239-5199
Email: bcaslin@jenner.com

Terrence J. Truax
Michael T. Brody
Shaun M. Van Horn
Gabriel A. Fuentes
Molly M. Powers
JENNER & BLOCK LLP
353 North Clark Street
Chicago, IL 60654
Tel: (312) 222-9350
Fax: (312) 527-0484
Email: ttruax@jenner.com
mbrody@jenner.com
svanhorn@jenner.com
gfuentes@jenner.com
mpowers@jenner.com

*Counsel for Mitsubishi Electric Corporation,
Mitsubishi Electric & Electronics USA, Inc.
and Mitsubishi Digital Electronic Americas,
Inc.*

Calvin L. Litsey
FAEGRE BAKER DANIELS LLP
1950 University Avenue, Suite 450
East Palo Alto, CA 94303-2279
Tel: (650) 324-6700
Email: calvin.litsey@faegrebd.com

Kathy L. Osborn
Ryan M. Hurley
FAEGRE BAKER DANIELS LLP
300 N. Meridian Street, Suite 2700
Indianapolis, IN 46204
Tel: (317) 237-0300
Email: kathy.osborn@faegrebd.com
ryan.hurley@faegrebd.com

Jeffrey S. Roberts
FAEGRE BAKER DANIELS LLP
3200 Wells Fargo
1700 Lincoln Street
Denver, CO 80203
Tel: (303) 607-3500
Email: jeff.roberts@faegrebd.com

Stephen M. Judge
FAEGRE BAKER DANIELS LLP
202 S. Michigan Street, Suite 1400
South Bend, IN 46601
Tel: (574) 234-4149
Email: steve.judge@faegrebd.com

Ryan M. Hurley (pro hac vice)
FAEGRE BAKER DANIELS LLP
300 N. Meridan Street, Suite 2700
Indianapolis, IN 46204
Tel: (317) 237-0300
Email: ryan.hurley@faegrebd.com

*Counsel for Defendants Thomson S.A. (N/K/A
Technicolor SA); Thomson Consumer
Electronics, Inc. (N/K/A Technicolor USA,
Inc.)*

Mark C. Dosker
Nathan Lane, III
SQUIRE SANDERS LLP
275 Battery Street, Suite 2600
San Francisco, CA 94111
Tel: 415-954-0200
Fax: 415-393-9887
Email: mark.dosker@squiresanders.com
nathan.lane@squiresanders.com

Ellen Tobin (pro hac vice)
Jeffrey I. Zuckerman (pro hac vice)
CURTIS, MALLET-PREVOST, COLT &
MOSLE LLP
101 Park Avenue
New York, NY 10178
Tel: (212) 696-8873
Email: etobin@curtis.com
jzuckerman@curtis.com

Arthur S. Gaus
DILLINGHAM & MURPHY, LLP
601 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 397-2700
Fax: (415) 397-3300
Email: asg@dillinghammurphy.com

*Counsel for Technologies Displays Americas
LLC and Videocon Industries, Ltd.*

EXHIBIT 8

GIBSON, DUNN & CRUTCHER LLP
JOEL S. SANDERS, SBN 107234
JSanders@gibsondunn.com
RACHEL S. BRASS, SBN 219301
RBrass@gibsondunn.com
AUSTIN SCHWING, SBN 211696
ASchwing@gibsondunn.com
555 Mission Street, Suite 3000
San Francisco, California 94105-2933
Telephone: 415.393.8200
Facsimile: 415.393.8306

Attorneys for Defendant
CHUNGHWA PICTURE TUBES, LTD.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates To:
DIRECT ACTION PLAINTIFF ACTIONS

CASE NO. 3:07-CV-5944 SC
MDL NO. 1917

**DEFENDANTS CHUNGHWA PICTURE
TUBES, LTD. AND CHUNGHWA
PICTURE TUBES (MALAYSIA) SDN.
BHD.'S OBJECTIONS TO DIRECT
ACTION PLAINTIFFS' FIRST SET OF
REQUESTS FOR ADMISSION**

PROPOUNDING PARTY: Direct Action Plaintiffs
RESPONDING PARTY: Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes
(Malaysia) Sdn. Bhd.
SET NO.: One

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendants Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia) Sdn. Bhd. ("CPT")¹ object to Direct Action Plaintiffs' ("Plaintiffs") First Set of Requests for Admission ("Requests"), dated August 1, 2014.

¹ Unless otherwise specified, "CPT" refers collectively to Chunghwa Picture Tubes, Ltd. and the now defunct Chunghwa Picture Tubes (Malaysia) Sdn. Bhd.

PRELIMINARY STATEMENT

CPT has not completed its investigation relating to this action, has not completed discovery in this action, and has not completed preparation for trial. As discovery proceeds, facts, information, evidence, documents and things may be discovered that are not set forth in these responses, but which may have been responsive to these Requests. The following responses are based on CPT's knowledge, information and belief at this time and are complete as to CPT's best knowledge at this time. Furthermore, these responses were prepared based on CPT's good faith interpretation and understanding of the Requests and are subject to correction for inadvertent errors or omissions, if any.

CPT reserves the right to refer to, conduct discovery with reference to, or to offer into evidence at the time of trial, any and all facts, evidence, documents and things developed during the course of discovery and trial preparation, notwithstanding the reference to facts, evidence, documents and things in these responses. In addition, CPT assumes no obligation to voluntarily supplement or amend these responses to reflect information, evidence, documents or things discovered following service of these responses. Nevertheless, these responses are given without prejudice to subsequent revision or supplementation, including objections, based upon any information, evidence and documentation, which hereinafter may be discovered.

GENERAL OBJECTIONS

1. CPT objects to the Requests to the extent that they seek to impose obligations beyond those required by the Federal Rules of Civil Procedure, the Local Rules for the Northern District of California, any agreement of the parties, or any other applicable law or rule.

2. CPT objects to the Requests on the grounds that they are unduly burdensome, harassing, and duplicative. Plaintiffs have attached a list of 2,198 documents with seven requests for admission as to each and every document, which constitutes 15,386 separate requests for admission. Such an extensive number of requests for admission in a single set of discovery is contrary to Rule 26(b) of the Federal Rules of Civil Procedure, and is demonstrative of the type of excessive and disproportionate use of a discovery mechanism for which the Advisory Committee has expressed profound concern. *See, e.g.*, May 8, 2013 Report of Advisory Comm. on Civil Rules at 9-12, available at <http://www.uscourts.gov/RulesAndPolicies/rules/archives/advisory-committee->

reports/advisory-committee-rules-civil-procedure.aspx (follow “May 2013”). CPT is willing, at an appropriate time before trial, to engage in a good faith negotiation on a stipulation regarding the authenticity and admissibility of a reasonable number of documents that plaintiffs reasonably and in good faith anticipate offering into evidence at trial.

3. CPT objects to these Requests to the extent they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

4. CPT objects to Plaintiffs’ definition of the terms “You” and “Your,” which includes “parent companies, subsidiaries, affiliates and their subsidiaries, and any employees, agents, representatives or any persons acting or purporting to act on Your behalf, including each of Your attorneys” because these definitions are vague, overly broad and unduly burdensome. Further, they include persons not controlled by CPT and seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and improperly purport to seek information from distinct corporate entities and persons not parties to the current action and not controlled by CPT.

5. Each of CPT’s responses is subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and any and all other objections and grounds which would require the exclusion of any information if made at the time of trial. All objections are therefore reserved and may be interposed at the time of trial.

SPECIFIC OBJECTIONS TO REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Separately for each document identified in Exhibit A, Admit that the document is a true, correct and genuine copy of the original.

OBJECTION TO REQUEST FOR ADMISSION NO. 1:

CPT hereby incorporates each of its General Objections into this response as though each were fully set forth herein. CPT further objects to this request for admission on the grounds that it is harassing, unduly burdensome, duplicative, and to the extent it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, particularly

1 insofar as this request for admission actually constitutes 2,198 separate requests for admission. *See*
2 General Objection No. 2.

3 **REQUEST FOR ADMISSION NO. 2:**

4 Separately for each document identified in Exhibit A, Admit that the document is authentic
5 and satisfies Fed. R. Evid. 901.

6 **OBJECTION TO REQUEST FOR ADMISSION NO. 2:**

7 CPT hereby incorporates each of its General Objections into this response as though each
8 were fully set forth herein. CPT further objects to this request for admission on the grounds that it is
9 harassing, unduly burdensome, duplicative, and to the extent it seeks information that is neither
10 relevant nor reasonably calculated to lead to the discovery of admissible evidence, particularly
11 insofar as this request for admission actually constitutes 2,198 separate requests for admission. *See*
12 General Objection No. 2.

13 **REQUEST FOR ADMISSION NO. 3:**

14 Separately for each document identified in Exhibit A, Admit that the document was made at
15 or near the time of the event reflected in the document.

16 **OBJECTION TO REQUEST FOR ADMISSION NO. 3:**

17 CPT hereby incorporates each of its General Objections into this response as though each
18 were fully set forth herein. CPT further objects to this request for admission on the grounds that it is
19 harassing, unduly burdensome, duplicative, and to the extent it seeks information that is neither
20 relevant nor reasonably calculated to lead to the discovery of admissible evidence, particularly
21 insofar as this request for admission actually constitutes 2,198 separate requests for admission. *See*
22 General Objection No. 2.

23 **REQUEST FOR ADMISSION NO. 4:**

24 Separately for each document identify in Exhibit A, Admit that the document was made by
25 someone with knowledge of the contents or event reflected in the document.

26 **OBJECTION TO REQUEST FOR ADMISSION NO. 4:**

27 CPT hereby incorporates each of its General Objections into this response as though each
28 were fully set forth herein. CPT further objects to this request for admission on the grounds that it is

1 harassing, unduly burdensome, duplicative, and to the extent it seeks information that is neither
2 relevant nor reasonably calculated to lead to the discovery of admissible evidence, particularly
3 insofar as this request for admission actually constitutes 2,198 separate requests for admission. *See*
4 General Objection No. 2.

5 **REQUEST FOR ADMISSION NO. 5:**

6 Separately for each document identified in Exhibit A, Admit that the document was kept in
7 the course of Your regularly conducted business.

8 **OBJECTION TO REQUEST FOR ADMISSION NO. 5:**

9 CPT hereby incorporates each of its General Objections into this response as though each
10 were fully set forth herein. CPT further objects to this request for admission on the grounds that it is
11 harassing, unduly burdensome, duplicative, and to the extent it seeks information that is neither
12 relevant nor reasonably calculated to lead to the discovery of admissible evidence, particularly
13 insofar as this request for admission actually constitutes 2,198 separate requests for admission. *See*
14 General Objection No. 2.

15 **REQUEST FOR ADMISSION NO. 6:**

16 Separately for each document identified in Exhibit A, Admit that the document was prepared
17 in the regular course of Your business.

18 **OBJECTION TO REQUEST FOR ADMISSION NO. 6:**

19 CPT hereby incorporates each of its General Objections into this response as though each
20 were fully set forth herein. CPT further objects to this request for admission on the grounds that it is
21 harassing, unduly burdensome, duplicative, and to the extent it seeks information that is neither
22 relevant nor reasonably calculated to lead to the discovery of admissible evidence, particularly
23 insofar as this request for admission actually constitutes 2,198 separate requests for admission. *See*
24 General Objection No. 2.

25 **REQUEST FOR ADMISSION NO. 7:**

26 Separately for each document identified in Exhibit A, Admit that the document satisfies Fed.
27 R. Evid. 803(6).
28

OBJECTION TO REQUEST FOR ADMISSION NO. 7:

CPT hereby incorporates each of its General Objections into this response as though each were fully set forth herein. CPT further objects to this request for admission on the grounds that it is harassing, unduly burdensome, duplicative, and to the extent it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, particularly insofar as this request for admission actually constitutes 2,198 separate requests for admission. *See* General Objection No. 2.

DATED: September 2, 2014

GIBSON, DUNN & CRUTCHER LLP
JOEL S. SANDERS
RACHEL S. BRASS
AUSTIN V. SCHWING

By: /s/ Rachel S. Brass

Joel S. Sanders (SBN 107234)
Rachel S. Brass (SBN 219301)
Austin Schwing (SBN 211696)
GIBSON, DUNN & CRUTCHER LLP
555 Mission Street, Suite 3000
San Francisco, CA 94105
(415) 393.8200 (Phone)
(415) 393.8306 (Facsimile)
jsanders@gibsondunn.com

Attorneys for Defendants
CHUNGHWA PICTURE TUBES, LTD. and
CHUNGHWA PICTURE TUBES (MALAYSIA) SDN.
BHD.

101789263.3

CERTIFICATE OF SERVICE

I, Joseph Hansen, declare as follows:

I am employed in the County of San Francisco, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 555 Mission Street, Suite 3000, San Francisco, California 94105, in said County and State. On the date indicated below, I served the within:

**DEFENDANTS CHUNGHWA PICTURE TUBES, LTD. AND
CHUNGHWA PICTURE TUBES (MALAYSIA) SDN. BHD.'S
OBJECTIONS TO DIRECT ACTION PLAINTIFFS' FIRST SET OF
REQUESTS FOR ADMISSION**

to each of the persons named below, in the manner described below:

Philip J. Iovieno
E-mail: piovieno@bsflp.com
BOIES, SCHILLER & FLEXNER LLP

Mario N. Alioto
E-mail: malioto@tatp.com
TRUMP, ALIOTO, TRUMP & PRESCOTT,
LLP

Liaison Counsel for Direct Action Plaintiffs

*Interim Lead Counsel for the Indirect
Purchaser Plaintiffs*

Guido Saveri
E-mail: guido@saveri.com
SAVERI & SAVERI, INC.

Emilio Varanini
E-mail: emilio.varanini@doj.ca.gov
STATE OF CALIFORNIA
Counsel for the State of California

*Interim Lead Counsel for the Direct
Purchaser Plaintiffs*

All Defense Counsel



BY ELECTRONIC MAIL: On the date shown below, a true copy PDF version of the above-referenced document was automatically e-mailed to the e-mail addresses of each party indicated on the service list.

I certify under penalty of perjury that the foregoing is true and correct, that the foregoing document was printed on recycled paper, and that this Certificate of Service was executed by me on September 2, 2014, at San Francisco, California.

/s/ Joseph Hansen
Joseph Hansen

EXHIBIT 9

1 ROBINS, KAPLAN, MILLER & CIRESI
L.L.P.

2 Roman M. Silberfeld, Bar No. 62783
RMSilberfeld@rkmc.com

3 Bernice Conn, Bar No. 161594
BConn@rkmc.com

4 David Martinez, Bar No. 193183
DMartinez@rkmc.com

5 2049 Century Park East, Suite 3400
Los Angeles, CA 90067-3208

6 Telephone: 310-552-0130

7 Facsimile: 310-229-5800

8 Attorneys for Plaintiffs

9 BEST BUY CO., INC.; BEST BUY
PURCHASING LLC; BEST BUY
ENTERPRISE SERVICES, INC.; BEST
10 BUY STORES, L.P.; BESTBUY.COM, LLC;
MAGNOLIA HI-FI, LLC

11 Additional Counsel Listed Below

12
13 **UNITED STATES DISTRICT COURT**

14 **NORTHERN DISTRICT OF CALIFORNIA**

15
16 IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. M:07-5994-SC
MDL No. 1917

17
18 **This Documents Relates To:**

19 *Electrograph Systems, Inc. et al. v. Hitachi,*
20 *Ltd., et al., No. 11-cv-01656;*

21 *Siegel v. Hitachi, Ltd., et al., No. 11-cv-05502;*

22 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,*
23 *No. 11-cv-05513;*

24 *Target Corp., et al. v. Chunghwa Picture Tubes,*
25 *Ltd., et al., No. 11-cv-05514;*

26 *Interbond Corporation of America v. Hitachi, et*
al., No. 11-cv-06275;

27 *Office Depot, Inc. v. Hitachi, Ltd., et al., No. 11-*
28 *cv-06276;*

**STIPULATION REGARDING
THE AUTHENTICITY OF
DOCUMENTS AND THEIR
STATUS AS "BUSINESS
RECORDS"**

1 *CompuCom Systems, Inc. v. Hitachi, Ltd. Et al.,*
2 *No. 11-cv-06396;*

3 *Costco Wholesale Corporation v. Hitachi, Ltd., et*
4 *al., No. 11-cv-06397;*

5 *P.C. Richard & Son Long Island Corporation, et*
6 *al. v. Hitachi, Ltd., et al., No. 12-cv-02648;*

7 *Schultze Agency Services, LLC v. Hitachi, Ltd., et*
8 *al., No. 12-cv-02649;*

9 *Tech Data Corporation, et al. v. Hitachi, Ltd., et*
10 *al., No. 13-cv-00157;*

11 *Sharp Electronics Corp., et al. v. Hitachi, Ltd., et*
12 *al., No. 13-cv-01173;*

13 *Dell Inc. and Dell Products L.P. v. Hitachi, Ltd.,*
14 *et al., No. 13-cv-02171;*

15 *Sharp Electronics Corp. et al. v. Koninklijke*
16 *Philips Electronics, N.V., et al., No. 13-cv-02776;*

17 *Siegel v. Technicolor SA, et al., No. 13-cv-05261;*

18 *Sears, Roebuck and Co., et al. v. Technicolor SA,*
19 *No. 13-cv-05262;*

20 *Schultze Agency Services, LLC v. Technicolor SA,*
21 *et al., No. 13-cv-05668;*

22 *Target Corp., v. Technicolor SA, et al., No. 13-cv-*
23 *05686;*

24 *Costco Wholesale Corporation v. Technicolor*
25 *SA,, et al., No. 13-cv-005723;*

26 *Electrograph Systems, Inc., et al. v. Technicolor*
27 *SA, et al., No. 13-cv-05724;*

28 *P.C. Richard & Son Long Island Corporation, et*
al. v. Technicolor SA, et al., No. 13-cv-05725;

Office Depot, Inc. v. Technicolor SA, et al., No.
13-cv-05726;

1 *Interbond Corporation of America v. Technicolor*
2 *SA, et al., No. 13-cv-05727.*

3 *ViewSonic Corporation, v. Chunghwa Picture*
4 *Tubes, Ltd., et al., 3:14cv-02510;*

5
6 WHEREAS, the Direct Action Plaintiffs (collectively “Plaintiffs”) and
7 Defendants Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes
8 (Malaysia) (“CPT”) wish to cooperate in developing an efficient means of
9 addressing the authenticity and status as business records of certain documents in
10 the above captioned litigation.
11

12 WHEREAS, the parties also wish to avoid the costs and burdens of discovery
13 to establish the authenticity and status as business records of documents;
14

15 NOW THEREFORE, IT IS HEREBY STIPULATED by the undersigned
16 counsel on behalf of the parties identified above (the “Stipulating Parties”), that:
17

18 1. None of the Stipulating Parties will object to the admissibility of any
19 document produced by one of the Stipulating Parties at the document identification
20 numbers listed in Exhibit A to this stipulation on the ground that it is not
21 “authentic” as that term is used in FRE 901 and FRE 902.
22

23 2. None of the Stipulating Parties will object to the admissibility of any
24 document listed in Exhibit B to this stipulation on the ground that it is not a
25 “duplicate” of the original, as that term is used in FRE 1001(4) and 1003.
26

27 3. None of the Stipulating Parties will object to the admissibility of any
28

1 document produced by one of the Stipulating Parties at the document identification
2 numbers listed in Exhibit C to this stipulation on the ground that it is not a business
3 record pursuant to FRE 803(6).
4

5 4. The Stipulating Parties agree that no document produced by one of the
6 Stipulating Parties at the Bates numbers listed in Exhibits A, B and C to this
7 stipulation requires a sponsoring witness to establish its authenticity or status as a
8 business record, as enumerated above in paragraphs 1-3.
9

10 5. The Stipulating Parties agree to meet and confer in good faith in
11 advance of trial to resolve issues relating to the authenticity and status as business
12 records of a) documents that CPT may seek to use in this case; and b) additional
13 documents that Plaintiffs may seek to use in this case.
14

15 6. Notwithstanding the above, nothing in this Stipulation shall preclude
16 any of the Stipulating Parties from challenging the admissibility or use of any
17 document on grounds not expressly stipulated to in paragraphs 1-5 above.
18
19

20
21 DATED: October 10, 2014

/s/ *Laura E. Nelson*

Roman M. Silberfeld
David Martinez
Jill S. Casselman
ROBINS, KAPLAN, MILLER & CIRESI
L.L.P.
2049 Century Park East, Suite 3400
Los Angeles, CA 90067-3208
Telephone: (310) 552-0130
Facsimile: (310) 229-5800
Email: rmsilberfeld@rkmc.com
dmartinez@rkmc.com
jscasselman@rkmc.com

1 Elliot S. Kaplan
2 K. Craig Wildfang
3 Laura E. Nelson
4 ROBINS, KAPLAN, MILLER & CIRESI
5 L.L.P.
6 800 LaSalle Avenue
7 2800 LaSalle Plaza
8 Minneapolis, MN 55402
9 Telephone: (612) 349-8500
10 Facsimile: (612) 339-4181
11 Email: eskaplan@rkmc.com
12 kcwildfang@rkmc.com
13 lenelson@rkmc.com

14 *Counsel For Plaintiffs Best Buy Co., Inc., Best*
15 *Buy Purchasing LLC, Best Buy Enterprise*
16 *Services, Inc., Best Buy Stores, L.P.,*
17 *Bestbuy.com, L.L.C., and Magnolia Hi-Fi,*
18 *LLC, and on behalf of the Direct Action*
19 *Plaintiffs*

20 Dated: October 10, 2014

21 /s/ Rachel S. Brass

22 Joel S. Sanders
23 Rachel S. Brass
24 Christine A. Fujita
25 GIBSON, DUNN & CRUTCHER LLP
26 555 Mission Street, Suite 3000
27 San Francisco, CA 94105
28 Telephone: 415-393-8200
Facsimile: 415-393-8206

Counsel for Defendants Chunghwa Picture
Tubes, Ltd. and Chunghwa Picture Tubes
(Malaysia)

Exhibit A

BEG BATES	END BATES
CHU0000207	CHU0000259
CHU00002853	CHU00003107
CHU00004334	CHU00005247
CHU00005997	CHU00006001
CHU00006004	CHU00006006
CHU00009205	CHU00009207
CHU00011251	CHU00011793
CHU00011783	CHU00011784
CHU00014182	CHU00014185
CHU00014189	CHU00014194
CHU00014198	CHU00014199
CHU00014200	CHU00014201
CHU00014202	CHU00014203
CHU00014204	CHU00014204
CHU00014205	CHU00014205
CHU00014212	CHU00014212
CHU00014213	CHU00014214
CHU00014218	CHU00014218
CHU00014223	CHU00014226
CHU00014232	CHU00014232
CHU00016887	CHU00016901
CHU00017003	CHU00017003
CHU00017026	CHU00017028
CHU00017037	CHU00017045
CHU00017069	CHU00017074
CHU00017076	CHU00017090
CHU00017092	CHU00017099
CHU00017130	CHU00017152
CHU00017750	CHU00017756
CHU00020661	CHU00020662
CHU00020779	CHU00020781
CHU00020782	CHU00020784
CHU00021268	CHU00021271
CHU00021272	CHU00021278
CHU00021280	CHU00021286
CHU00021289	CHU00021289

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00021415	CHU00021766
CHU00021791	CHU00021794
CHU00022583	CHU00022585
CHU00022696	CHU00022696
CHU00022768	CHU00022955
CHU00023392	CHU00023394
CHU00024519	CHU00025005
CHU00024554	CHU00024559
CHU00024560	CHU00024563
CHU00028209	CHU00028210
CHU00028224	CHU00028225
CHU00028229	CHU00028330
CHU00028231	CHU00028233
CHU00028240	CHU00028240
CHU00028283	CHU00028285
CHU00028291	CHU00028292
CHU00028300	CHU00028301
CHU00028311	CHU00028313
CHU00028374	CHU00028375
CHU00028376	CHU00028376
CHU00028377	CHU00028379
CHU00028382	CHU00028382
CHU00028383	CHU00028384
CHU00028385	CHU00028387
CHU00028393	CHU00028393
CHU00028396	CHU00028397
CHU00028424	CHU00028424
CHU00028425	CHU00028426
CHU00028427	CHU00028429
CHU00028430	CHU00028431
CHU00028432	CHU00028433
CHU00028434	CHU00028434
CHU00028438	CHU00028438
CHU00028453	CHU00028455
CHU00028463	CHU00028464
CHU00028490	CHU00028492
CHU00028495	CHU00028496
CHU00028503	CHU00028503

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00028507	CHU00028507
CHU00028514	CHU00028515
CHU00028516	CHU00028518
CHU00028521	CHU00028523
CHU00028524	CHU00028525
CHU00028532	CHU00028533
CHU00028548	CHU00028550
CHU00028558	CHU00028558
CHU00028613	CHU00028614
CHU00028642	CHU00028644
CHU00028648	CHU00028650
CHU00028654	CHU00028655
CHU00028656	CHU00028657
CHU00028670	CHU00028671
CHU00028677	CHU00028679
CHU00028685	CHU00028686
CHU00028687	CHU00028688
CHU00028691	CHU00028693
CHU00028698	CHU00028698
CHU00028701	CHU00028703
CHU00028705	CHU00028706
CHU00028707	CHU00028710
CHU00028711	CHU00028712
CHU00028717	CHU00028721
CHU00028723	CHU00028724
CHU00028725	CHU00028727
CHU00028730	CHU00028733
CHU00028734	CHU00028735
CHU00028736	CHU00028736
CHU00028737	CHU00028737
CHU00028740	CHU00028743
CHU00028749	CHU00028751
CHU00028758	CHU00028759
CHU00028760	CHU00028762
CHU00028768	CHU00028770
CHU00028776	CHU00028780
CHU00028784	CHU00028785
CHU00028786	CHU00028788

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00028791	CHU00028793
CHU00028803	CHU00028804
CHU00028809	CHU00028810
CHU00028817	CHU00028820
CHU00028841	CHU00028843
CHU00028848	CHU00028850
CHU00028851	CHU00028852
CHU00028853	CHU00028855
CHU00028856	CHU00028857
CHU00028865	CHU00028867
CHU00028868	CHU00028868
CHU00028869	CHU00028872
CHU00028873	CHU00028873
CHU00028874	CHU00028876
CHU00028889	CHU00028892
CHU00028909	CHU00028911
CHU00028933	CHU00028945
CHU00028955	CHU00028957
CHU00028958	CHU00028958
CHU00028959	CHU00028959
CHU00028960	CHU00028961
CHU00028975	CHU00028976
CHU00028985	CHU00028989
CHU00028993	CHU00029014
CHU00029050	CHU00029051
CHU00029062	CHU00029064
CHU00029070	CHU00029082
CHU00029084	CHU00029086
CHU00029108	CHU00029109
CHU00029116	CHU00029123
CHU00029138	CHU00029143
CHU00029147	CHU00029151
CHU00029152	CHU00029154
CHU00029163	CHU00029170
CHU00029175	CHU00029178
CHU00029189	CHU00029190
CHU00029191	CHU00029194
CHU00029214	CHU00029220

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00029221	CHU00029227
CHU00029235	CHU00029237
CHU00029245	CHU00029247
CHU00029259	CHU00029261
CHU00029262	CHU00029264
CHU00029281	CHU00029286
CHU00029316	CHU00029320
CHU00029944	CHU00029955
CHU00029971	CHU00029972
CHU00029977	CHU00029984
CHU00030051	CHU00030051
CHU00030058	CHU00030059
CHU00030064	CHU00030065
CHU00030068	CHU00030069
CHU00030071	CHU00030078
CHU00030080	CHU00030081
CHU00030410	CHU00030413
CHU00030421	CHU00030424
CHU00030520	CHU00030523
CHU00030526	CHU00030529
CHU00030537	CHU00030538
CHU00030547	CHU00030552
CHU00030557	CHU00030558
CHU00030559	CHU00030562
CHU00030665	CHU00030667
CHU00030679	CHU00030683
CHU00030684	CHU00030687
CHU00030688	CHU00030691
CHU00030695	CHU00030697
CHU00030698	CHU00030700
CHU00030701	CHU00030704
CHU00030713	CHU00030716
CHU00030717	CHU00030719
CHU00030745	CHU00030747
CHU00030749	CHU00030751
CHU00030777	CHU00030780
CHU00030787	CHU00030794
CHU00030797	CHU00030798

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00030799	CHU00030800
CHU00030816	CHU00030818
CHU00030819	CHU00030822
CHU00030827	CHU00030830
CHU00030835	CHU00030838
CHU00030839	CHU00030840
CHU00030872	CHU00030874
CHU00030881	CHU00030884
CHU00030894	CHU00030894
CHU00030916	CHU00030916
CHU00030922	CHU00030937
CHU00030960	CHU00030962
CHU00030965	CHU00030970
CHU00030979	CHU00030984
CHU00030985	CHU00030990
CHU00030992	CHU00030994
CHU00030995	CHU00030997
CHU00030998	CHU00030998
CHU00031006	CHU00031009
CHU00031010	CHU00031012
CHU00031015	CHU00031016
CHU00031017	CHU00031017
CHU00031018	CHU00031020
CHU00031028	CHU00031030
CHU00031040	CHU00031043
CHU00031044	CHU00031046
CHU00031056	CHU00031066
CHU00031067	CHU00031069
CHU00031075	CHU00031087
CHU00031101	CHU00031104
CHU00031105	CHU00031106
CHU00031111	CHU00031112
CHU00031113	CHU00031114
CHU00031123	CHU00031125
CHU00031136	CHU00031136
CHU00031141	CHU00031141
CHU00031142	CHU00031147
CHU00031150	CHU00031152

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00031174	CHU00031175
CHU00031176	CHU00031176
CHU00031178	CHU00031179
CHU00031180	CHU00031181
CHU00031182	CHU00031182
CHU00031183	CHU00031185
CHU00031190	CHU00031193
CHU00031194	CHU00031201
CHU00031202	CHU00031208
CHU00031209	CHU00031213
CHU00031214	CHU00031220
CHU00031221	CHU00031226
CHU00031240	CHU00031247
CHU00031249	CHU00031252
CHU00031254	CHU00031254
CHU00031274	CHU00031277
CHU00031804	CHU00031804
CHU00032057	CHU00032058
CHU00033201	CHU00033202
CHU00036378	CHU00036380
CHU00036382	CHU00036383
CHU00036384	CHU00036385
CHU00036386	CHU00036387
CHU00036394	CHU00036395
CHU00036406	CHU00036407
CHU00036410	CHU00036411
CHU00036412	CHU00036413
CHU00045143	CHU00045150
CHU00047663	CHU00047674
CHU00066032	CHU00066064
CHU00071226	CHU00071279
CHU00071480	CHU00071482
CHU00072808	CHU00072819
CHU00093512	CHU00093519
CHU00095612	CHU00095617
CHU00102752	CHU00102754
CHU00102864	CHU00102865
CHU00113999	CHU00113999

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00119571	CHU00119573
CHU00119823	CHU00119849
CHU00121161	CHU00121192
CHU00123358	CHU00123361
CHU00123375	CHU00123378
CHU00123393	CHU00123397
CHU00123530	CHU00123531
CHU00123530	CHU00123530
CHU00123733	CHU00123733
CHU00124017	CHU00124019
CHU00124020	CHU00124021
CHU00124027	CHU00124029
CHU00124110	CHU00124115
CHU00124116	CHU00124118
CHU00124930	CHU00124981
CHU00125005	CHU00125008
CHU00125098	CHU00125110
CHU00125116	CHU00125125
CHU00125126	CHU00125138
CHU00125139	CHU00125140
CHU00125157	CHU00125161
CHU00125162	CHU00125167
CHU00125171	CHU00125180
CHU00125181	CHU00125183
CHU00125192	CHU00125194
CHU00125195	CHU00125198
CHU00125199	CHU00125206
CHU00125257	CHU00125292
CHU00125652	CHU00125653
CHU00125654	CHU00125654
CHU00125849	CHU00125858
CHU00125895	CHU00125899
CHU00126131	CHU00126133
CHU00154421	CHU00154454
CHU00281352	CHU00281923
CHU00303245	CHU00303797
CHU00363457	CHU00363467
CHU00438214	CHU00438218

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00513751	CHU00513751
CHU00532449	CHU00532454
CHU00548418	CHU00548422
CHU00549433	CHU00549453
CHU00597476	CHU00597478
CHU00608183	CHU00608183
CHU00608395	CHU00608398
CHU00631432	CHU00631432
CHU00631434	CHU00631437
CHU00637563	CHU00637565
CHU00637566	CHU00637586
CHU00638344	CHU00638344
CHU00644988	CHU00644994
CHU00645156	CHU00645156
CHU00647932	CHU00647943
CHU00648024	CHU00648025
CHU00649654	CHU00649657
CHU00655716	CHU00655717
CHU00660173	CHU00660176
CHU00660181	CHU00660183
CHU00660198	CHU00660199
CHU00660213	CHU00660216
CHU00660217	CHU00660220
CHU00660306	CHU00660311
CHU00660324	CHU00660328
CHU00660350	CHU00660352
CHU00660363	CHU00660365
CHU00660373	CHU00660382
CHU00660383	CHU00660394
CHU00660395	CHU00660407
CHU00660408	CHU00660418
CHU00660419	CHU00660425
CHU00660426	CHU00660435
CHU00660436	CHU00660445
CHU00660446	CHU00660453
CHU00660454	CHU00660463
CHU00660476	CHU00660486
CHU00660487	CHU00660500

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00660539	CHU00660548
CHU00660549	CHU00660560
CHU00660561	CHU00660574
CHU00660606	CHU00660615
CHU00660626	CHU00660632
CHU00660643	CHU00660651
CHU00660643	CHU00660651
CHU00660671	CHU00660680
CHU00660681	CHU00660692
CHU00660693	CHU00660698
CHU00660699	CHU00660708
CHU00660709	CHU00660716
CHU00660717	CHU00660727
CHU00660728	CHU00660735
CHU00660741	CHU00660745
CHU00661917	CHU00661928
CHU00732831	CHU00732834
CHU00735253	CHU00735255
CHU00735299	CHU00735312
CHU00735380	CHU00735386
CHU00735558	CHU00735558
CHWA00062147	CHWA00062569
CHWA00088192	CHWA00088762
CHWA00106460	CHWA00106757

Exhibit B

BEG BATES	END BATES
CHU0000207	CHU0000259
CHU00002853	CHU00003107
CHU00004334	CHU00005247
CHU00005997	CHU00006001
CHU00006004	CHU00006006
CHU00009205	CHU00009207
CHU00011783	CHU00011784
CHU00014182	CHU00014185
CHU00014189	CHU00014194
CHU00014198	CHU00014199
CHU00014200	CHU00014201
CHU00014202	CHU00014203
CHU00014204	CHU00014204
CHU00014205	CHU00014205
CHU00014212	CHU00014212
CHU00014213	CHU00014214
CHU00014218	CHU00014218
CHU00014223	CHU00014226
CHU00014232	CHU00014232
CHU00016887	CHU00016901
CHU00017003	CHU00017003
CHU00017026	CHU00017028
CHU00017037	CHU00017045
CHU00017069	CHU00017074
CHU00017076	CHU00017090
CHU00017092	CHU00017099
CHU00017130	CHU00017152
CHU00017750	CHU00017756
CHU00020661	CHU00020662
CHU00020779	CHU00020781
CHU00020782	CHU00020784
CHU00021272	CHU00021278
CHU00021280	CHU00021286
CHU00021289	CHU00021289
CHU00021415	CHU00021766
CHU00021791	CHU00021794

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00022583	CHU00022585
CHU00022696	CHU00022696
CHU00022768	CHU00022955
CHU00023392	CHU00023394
CHU00024519	CHU00025005
CHU00024554	CHU00024559
CHU00024560	CHU00024563
CHU00028209	CHU00028210
CHU00028224	CHU00028225
CHU00028229	CHU00028330
CHU00028231	CHU00028233
CHU00028240	CHU00028240
CHU00028283	CHU00028285
CHU00028291	CHU00028292
CHU00028300	CHU00028301
CHU00028311	CHU00028313
CHU00028374	CHU00028375
CHU00028376	CHU00028376
CHU00028377	CHU00028379
CHU00028382	CHU00028382
CHU00028383	CHU00028384
CHU00028385	CHU00028387
CHU00028393	CHU00028393
CHU00028396	CHU00028397
CHU00028424	CHU00028424
CHU00028425	CHU00028426
CHU00028427	CHU00028429
CHU00028430	CHU00028431
CHU00028432	CHU00028433
CHU00028434	CHU00028434
CHU00028438	CHU00028438
CHU00028453	CHU00028455
CHU00028463	CHU00028464
CHU00028490	CHU00028492
CHU00028495	CHU00028496
CHU00028503	CHU00028503
CHU00028507	CHU00028507
CHU00028514	CHU00028515

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00028516	CHU00028518
CHU00028521	CHU00028523
CHU00028524	CHU00028525
CHU00028532	CHU00028533
CHU00028548	CHU00028550
CHU00028558	CHU00028558
CHU00028613	CHU00028614
CHU00028642	CHU00028644
CHU00028648	CHU00028650
CHU00028654	CHU00028655
CHU00028656	CHU00028657
CHU00028670	CHU00028671
CHU00028677	CHU00028679
CHU00028685	CHU00028686
CHU00028687	CHU00028688
CHU00028691	CHU00028693
CHU00028698	CHU00028698
CHU00028701	CHU00028703
CHU00028705	CHU00028706
CHU00028707	CHU00028710
CHU00028711	CHU00028712
CHU00028717	CHU00028721
CHU00028723	CHU00028724
CHU00028725	CHU00028727
CHU00028730	CHU00028733
CHU00028734	CHU00028735
CHU00028736	CHU00028736
CHU00028737	CHU00028737
CHU00028740	CHU00028743
CHU00028749	CHU00028751
CHU00028758	CHU00028759
CHU00028760	CHU00028762
CHU00028768	CHU00028770
CHU00028776	CHU00028780
CHU00028784	CHU00028785
CHU00028786	CHU00028788
CHU00028791	CHU00028793
CHU00028803	CHU00028804

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00028809	CHU00028810
CHU00028817	CHU00028820
CHU00028841	CHU00028843
CHU00028848	CHU00028850
CHU00028851	CHU00028852
CHU00028853	CHU00028855
CHU00028856	CHU00028857
CHU00028865	CHU00028867
CHU00028868	CHU00028868
CHU00028869	CHU00028872
CHU00028873	CHU00028873
CHU00028874	CHU00028876
CHU00028889	CHU00028892
CHU00028909	CHU00028911
CHU00028933	CHU00028945
CHU00028955	CHU00028957
CHU00028958	CHU00028958
CHU00028959	CHU00028959
CHU00028960	CHU00028961
CHU00028975	CHU00028976
CHU00028985	CHU00028989
CHU00028993	CHU00029014
CHU00029050	CHU00029051
CHU00029062	CHU00029064
CHU00029070	CHU00029082
CHU00029084	CHU00029086
CHU00029108	CHU00029109
CHU00029116	CHU00029123
CHU00029138	CHU00029143
CHU00029147	CHU00029151
CHU00029152	CHU00029154
CHU00029163	CHU00029170
CHU00029175	CHU00029178
CHU00029189	CHU00029190
CHU00029191	CHU00029194
CHU00029214	CHU00029220
CHU00029221	CHU00029227
CHU00029235	CHU00029237

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00029245	CHU00029247
CHU00029259	CHU00029261
CHU00029262	CHU00029264
CHU00029281	CHU00029286
CHU00029316	CHU00029320
CHU00029944	CHU00029955
CHU00029971	CHU00029972
CHU00029977	CHU00029984
CHU00030051	CHU00030051
CHU00030058	CHU00030059
CHU00030064	CHU00030065
CHU00030068	CHU00030069
CHU00030071	CHU00030078
CHU00030080	CHU00030081
CHU00030410	CHU00030413
CHU00030421	CHU00030424
CHU00030520	CHU00030523
CHU00030526	CHU00030529
CHU00030537	CHU00030538
CHU00030547	CHU00030552
CHU00030557	CHU00030558
CHU00030559	CHU00030562
CHU00030665	CHU00030667
CHU00030679	CHU00030683
CHU00030684	CHU00030687
CHU00030688	CHU00030691
CHU00030695	CHU00030697
CHU00030698	CHU00030700
CHU00030701	CHU00030704
CHU00030713	CHU00030716
CHU00030717	CHU00030719
CHU00030745	CHU00030747
CHU00030749	CHU00030751
CHU00030777	CHU00030780
CHU00030787	CHU00030794
CHU00030797	CHU00030798
CHU00030799	CHU00030800
CHU00030816	CHU00030818

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00030819	CHU00030822
CHU00030827	CHU00030830
CHU00030835	CHU00030838
CHU00030839	CHU00030840
CHU00030872	CHU00030874
CHU00030881	CHU00030884
CHU00030894	CHU00030894
CHU00030916	CHU00030916
CHU00030922	CHU00030937
CHU00030960	CHU00030962
CHU00030965	CHU00030970
CHU00030979	CHU00030984
CHU00030985	CHU00030990
CHU00030992	CHU00030994
CHU00030995	CHU00030997
CHU00030998	CHU00030998
CHU00031006	CHU00031009
CHU00031010	CHU00031012
CHU00031015	CHU00031016
CHU00031017	CHU00031017
CHU00031018	CHU00031020
CHU00031028	CHU00031030
CHU00031040	CHU00031043
CHU00031044	CHU00031046
CHU00031056	CHU00031066
CHU00031067	CHU00031069
CHU00031075	CHU00031087
CHU00031101	CHU00031104
CHU00031105	CHU00031106
CHU00031111	CHU00031112
CHU00031113	CHU00031114
CHU00031123	CHU00031125
CHU00031136	CHU00031136
CHU00031141	CHU00031141
CHU00031142	CHU00031147
CHU00031150	CHU00031152
CHU00031174	CHU00031175
CHU00031176	CHU00031176

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00031178	CHU00031179
CHU00031180	CHU00031181
CHU00031182	CHU00031182
CHU00031183	CHU00031185
CHU00031190	CHU00031193
CHU00031194	CHU00031201
CHU00031202	CHU00031208
CHU00031209	CHU00031213
CHU00031214	CHU00031220
CHU00031221	CHU00031226
CHU00031240	CHU00031247
CHU00031249	CHU00031252
CHU00031254	CHU00031254
CHU00031274	CHU00031277
CHU00031804	CHU00031804
CHU00032057	CHU00032058
CHU00033201	CHU00033202
CHU00036378	CHU00036380
CHU00036382	CHU00036383
CHU00036384	CHU00036385
CHU00036386	CHU00036387
CHU00036394	CHU00036395
CHU00036406	CHU00036407
CHU00036410	CHU00036411
CHU00036412	CHU00036413
CHU00045143	CHU00045150
CHU00047663	CHU00047674
CHU00066032	CHU00066064
CHU00071226	CHU00071279
CHU00071480	CHU00071482
CHU00072808	CHU00072819
CHU00093512	CHU00093519
CHU00095612	CHU00095617
CHU00102752	CHU00102754
CHU00102864	CHU00102865
CHU00113999	CHU00113999
CHU00119571	CHU00119573
CHU00119823	CHU00119849

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00121161	CHU00121192
CHU00123358	CHU00123361
CHU00123375	CHU00123378
CHU00123393	CHU00123397
CHU00123530	CHU00123531
CHU00123530	CHU00123530
CHU00123733	CHU00123733
CHU00124017	CHU00124019
CHU00124020	CHU00124021
CHU00124027	CHU00124029
CHU00124110	CHU00124115
CHU00124116	CHU00124118
CHU00124930	CHU00124981
CHU00125005	CHU00125008
CHU00125098	CHU00125110
CHU00125116	CHU00125125
CHU00125126	CHU00125138
CHU00125139	CHU00125140
CHU00125157	CHU00125161
CHU00125171	CHU00125180
CHU00125181	CHU00125183
CHU00125192	CHU00125194
CHU00125195	CHU00125198
CHU00125257	CHU00125292
CHU00125652	CHU00125653
CHU00125654	CHU00125654
CHU00125691	CHU00125698
CHU00125703	CHU00125709
CHU00125849	CHU00125858
CHU00125895	CHU00125899
CHU00125993	CHU00125997
CHU00126131	CHU00126133
CHU00154421	CHU00154454
CHU00281352	CHU00281923
CHU00303245	CHU00303797
CHU00363457	CHU00363467
CHU00438214	CHU00438218
CHU00549433	CHU00549453

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00608183	CHU00608183
CHU00631432	CHU00631432
CHU00631434	CHU00631437
CHU00637563	CHU00637565
CHU00637566	CHU00637586
CHU00638344	CHU00638344
CHU00644988	CHU00644994
CHU00645156	CHU00645156
CHU00647932	CHU00647943
CHU00648024	CHU00648025
CHU00649654	CHU00649657
CHU00655716	CHU00655717
CHU00660173	CHU00660176
CHU00660181	CHU00660183
CHU00660198	CHU00660199
CHU00660213	CHU00660216
CHU00660217	CHU00660220
CHU00660306	CHU00660311
CHU00660324	CHU00660328
CHU00660350	CHU00660352
CHU00660363	CHU00660365
CHU00660373	CHU00660382
CHU00660383	CHU00660394
CHU00660395	CHU00660407
CHU00660408	CHU00660418
CHU00660419	CHU00660425
CHU00660426	CHU00660435
CHU00660436	CHU00660445
CHU00660446	CHU00660453
CHU00660454	CHU00660463
CHU00660476	CHU00660486
CHU00660487	CHU00660500
CHU00660539	CHU00660548
CHU00660549	CHU00660560
CHU00660561	CHU00660574
CHU00660606	CHU00660615
CHU00660626	CHU00660632
CHU00660643	CHU00660651

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00660643	CHU00660651
CHU00660671	CHU00660680
CHU00660681	CHU00660692
CHU00660693	CHU00660698
CHU00660699	CHU00660708
CHU00660709	CHU00660716
CHU00660717	CHU00660727
CHU00660728	CHU00660735
CHU00660741	CHU00660745
CHU00661917	CHU00661928
CHU00732831	CHU00732834
CHU00735253	CHU00735255
CHU00735299	CHU00735312
CHU00735380	CHU00735386
CHU00735558	CHU00735558
CHWA00062147	CHWA00062569
CHWA00088192	CHWA00088762
CHWA00106460	CHWA00106757

Exhibit C

BEG BATES	END BATES
CHU0000207	CHU0000259
CHU00005997	CHU00006001
CHU00006004	CHU00006006
CHU00011783	CHU00011784
CHU00014200	CHU00014201
CHU00014202	CHU00014203
CHU00014204	CHU00014204
CHU00014205	CHU00014205
CHU00014212	CHU00014212
CHU00014213	CHU00014214
CHU00014218	CHU00014218
CHU00014223	CHU00014226
CHU00014232	CHU00014232
CHU00017003	CHU00017003
CHU00017026	CHU00017028
CHU00017037	CHU00017045
CHU00017069	CHU00017074
CHU00017750	CHU00017756
CHU00020661	CHU00020662
CHU00020779	CHU00020781
CHU00020782	CHU00020784
CHU00021268	CHU00021271
CHU00021280	CHU00021286
CHU00021289	CHU00021289
CHU00021415	CHU00021766
CHU00021791	CHU00021794
CHU00022583	CHU00022585
CHU00022696	CHU00022696
CHU00022768	CHU00022955
CHU00024554	CHU00024559
CHU00024560	CHU00024563
CHU00028209	CHU00028210
CHU00028224	CHU00028225
CHU00028229	CHU00028330
CHU00028231	CHU00028233
CHU00028240	CHU00028240

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00028283	CHU00028285
CHU00028291	CHU00028292
CHU00028300	CHU00028301
CHU00028311	CHU00028313
CHU00028374	CHU00028375
CHU00028376	CHU00028376
CHU00028377	CHU00028379
CHU00028382	CHU00028382
CHU00028383	CHU00028384
CHU00028385	CHU00028387
CHU00028393	CHU00028393
CHU00028396	CHU00028397
CHU00028424	CHU00028424
CHU00028425	CHU00028426
CHU00028427	CHU00028429
CHU00028430	CHU00028431
CHU00028432	CHU00028433
CHU00028434	CHU00028434
CHU00028438	CHU00028438
CHU00028453	CHU00028455
CHU00028463	CHU00028464
CHU00028490	CHU00028492
CHU00028495	CHU00028496
CHU00028503	CHU00028503
CHU00028507	CHU00028507
CHU00028514	CHU00028515
CHU00028516	CHU00028518
CHU00028521	CHU00028523
CHU00028524	CHU00028525
CHU00028532	CHU00028533
CHU00028548	CHU00028550
CHU00028558	CHU00028558
CHU00028613	CHU00028614
CHU00028642	CHU00028644
CHU00028648	CHU00028650
CHU00028654	CHU00028655
CHU00028656	CHU00028657
CHU00028670	CHU00028671

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00028677	CHU00028679
CHU00028685	CHU00028686
CHU00028687	CHU00028688
CHU00028691	CHU00028693
CHU00028698	CHU00028698
CHU00028701	CHU00028703
CHU00028705	CHU00028706
CHU00028707	CHU00028710
CHU00028711	CHU00028712
CHU00028717	CHU00028721
CHU00028723	CHU00028724
CHU00028725	CHU00028727
CHU00028730	CHU00028733
CHU00028734	CHU00028735
CHU00028736	CHU00028736
CHU00028737	CHU00028737
CHU00028740	CHU00028743
CHU00028749	CHU00028751
CHU00028758	CHU00028759
CHU00028760	CHU00028762
CHU00028768	CHU00028770
CHU00028784	CHU00028785
CHU00028786	CHU00028788
CHU00028791	CHU00028793
CHU00028803	CHU00028804
CHU00028809	CHU00028810
CHU00028817	CHU00028820
CHU00028841	CHU00028843
CHU00028848	CHU00028850
CHU00028851	CHU00028852
CHU00028853	CHU00028855
CHU00028856	CHU00028857
CHU00028865	CHU00028867
CHU00028868	CHU00028868
CHU00028869	CHU00028872
CHU00028873	CHU00028873
CHU00028874	CHU00028876
CHU00028889	CHU00028892

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00028909	CHU00028911
CHU00028933	CHU00028945
CHU00028955	CHU00028957
CHU00028958	CHU00028958
CHU00028959	CHU00028959
CHU00028960	CHU00028961
CHU00028975	CHU00028976
CHU00029050	CHU00029051
CHU00029062	CHU00029064
CHU00029116	CHU00029123
CHU00029138	CHU00029143
CHU00029147	CHU00029151
CHU00029152	CHU00029154
CHU00029163	CHU00029170
CHU00029175	CHU00029178
CHU00029189	CHU00029190
CHU00029191	CHU00029194
CHU00029235	CHU00029237
CHU00029259	CHU00029261
CHU00029262	CHU00029264
CHU00029281	CHU00029286
CHU00029316	CHU00029320
CHU00029971	CHU00029972
CHU00029977	CHU00029984
CHU00030051	CHU00030051
CHU00030058	CHU00030059
CHU00030064	CHU00030065
CHU00030068	CHU00030069
CHU00030080	CHU00030081
CHU00030410	CHU00030413
CHU00030421	CHU00030424
CHU00030520	CHU00030523
CHU00030526	CHU00030529
CHU00030537	CHU00030538
CHU00030547	CHU00030552
CHU00030557	CHU00030558
CHU00030559	CHU00030562
CHU00030665	CHU00030667

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00030684	CHU00030687
CHU00030688	CHU00030691
CHU00030695	CHU00030697
CHU00030698	CHU00030700
CHU00030701	CHU00030704
CHU00030713	CHU00030716
CHU00030717	CHU00030719
CHU00030745	CHU00030747
CHU00030749	CHU00030751
CHU00030777	CHU00030780
CHU00030787	CHU00030794
CHU00030797	CHU00030798
CHU00030799	CHU00030800
CHU00030816	CHU00030818
CHU00030819	CHU00030822
CHU00030827	CHU00030830
CHU00030835	CHU00030838
CHU00030839	CHU00030840
CHU00030872	CHU00030874
CHU00030881	CHU00030884
CHU00030894	CHU00030894
CHU00030916	CHU00030916
CHU00030922	CHU00030937
CHU00030960	CHU00030962
CHU00030965	CHU00030970
CHU00030979	CHU00030984
CHU00030985	CHU00030990
CHU00030992	CHU00030994
CHU00030995	CHU00030997
CHU00030998	CHU00030998
CHU00031006	CHU00031009
CHU00031010	CHU00031012
CHU00031015	CHU00031016
CHU00031017	CHU00031017
CHU00031018	CHU00031020
CHU00031028	CHU00031030
CHU00031040	CHU00031043
CHU00031044	CHU00031046

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00031056	CHU00031066
CHU00031067	CHU00031069
CHU00031075	CHU00031087
CHU00031101	CHU00031104
CHU00031105	CHU00031106
CHU00031111	CHU00031112
CHU00031113	CHU00031114
CHU00031123	CHU00031125
CHU00031136	CHU00031136
CHU00031141	CHU00031141
CHU00031142	CHU00031147
CHU00031150	CHU00031152
CHU00031174	CHU00031175
CHU00031176	CHU00031176
CHU00031178	CHU00031179
CHU00031180	CHU00031181
CHU00031182	CHU00031182
CHU00031183	CHU00031185
CHU00031190	CHU00031193
CHU00031194	CHU00031201
CHU00031202	CHU00031208
CHU00031209	CHU00031213
CHU00031214	CHU00031220
CHU00031221	CHU00031226
CHU00031240	CHU00031247
CHU00031249	CHU00031252
CHU00031254	CHU00031254
CHU00031274	CHU00031277
CHU00031804	CHU00031804
CHU00032057	CHU00032058
CHU00033201	CHU00033202
CHU00036378	CHU00036380
CHU00036382	CHU00036383
CHU00036384	CHU00036385
CHU00036386	CHU00036387
CHU00036394	CHU00036395
CHU00036406	CHU00036407
CHU00036410	CHU00036411

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00036412	CHU00036413
CHU00045143	CHU00045150
CHU00047663	CHU00047674
CHU00066032	CHU00066064
CHU00093512	CHU00093519
CHU00095612	CHU00095617
CHU00119571	CHU00119573
CHU00123530	CHU00123530
CHU00124017	CHU00124019
CHU00124020	CHU00124021
CHU00124027	CHU00124029
CHU00124110	CHU00124115
CHU00124116	CHU00124118
CHU00125181	CHU00125183
CHU00125192	CHU00125194
CHU00125652	CHU00125653
CHU00125654	CHU00125654
CHU00126131	CHU00126133
CHU00363457	CHU00363467
CHU00438214	CHU00438218
CHU00608183	CHU00608183
CHU00631434	CHU00631437
CHU00637563	CHU00637565
CHU00637566	CHU00637586
CHU00638344	CHU00638344
CHU00644988	CHU00644994
CHU00645156	CHU00645156
CHU00648024	CHU00648025
CHU00649654	CHU00649657
CHU00655716	CHU00655717
CHU00660173	CHU00660176
CHU00660181	CHU00660183
CHU00660306	CHU00660311
CHU00660324	CHU00660328
CHU00660350	CHU00660352
CHU00660363	CHU00660365
CHU00660741	CHU00660745
CHU00732831	CHU00732834

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEG BATES	END BATES
CHU00735253	CHU00735255
CHU00735380	CHU00735386
CHU00735558	CHU00735558

EXHIBIT 10

1 Stuart H. Singer
2 BOIES, SCHILLER, & FLEXNER LLP
3 401 East Las Olas Boulevard, Suite 1200
4 Fort Lauderdale, Florida 33301
5 Telephone: (954) 356-0011
6 Facsimile: (954) 356-0022
7 Email: ssinger@bsfllp.com

8 William A. Isaacson
9 BOIES, SCHILLER & FLEXNER LLP
10 5301 Wisconsin Ave. NW, Suite 800
11 Washington, D.C. 20015
12 Telephone: (202) 237-2727
13 Facsimile: (202) 237-6131
14 Email: wisaacson@bsfllp.com

15 Philip J. Iovieno
16 Anne M. Nardacci
17 BOIES, SCHILLER & FLEXNER LLP
18 30 South Pearl Street, 11th Floor
19 Albany, NY 12207
20 Telephone: (518) 434-0600
21 Facsimile: (518) 434-0665
22 Email: piovieno@bsfllp.com
23 Email: anardacci@bsfllp.com

24 *Liaison Counsel for the Direct Action Plaintiffs*

25 **UNITED STATES DISTRICT COURT**
26 **NORTHERN DISTRICT OF CALIFORNIA**
27 **SAN FRANCISCO DIVISION**

28 In re: Cathode Ray Tube (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-md-05944-SC

MDL No. 1917

This Document Relates To:

DIRECT ACTION PLAINTIFF ACTIONS

DIRECT ACTION PLAINTIFFS'
RENEWED MOTION TO COMPEL
DEFENDANTS TO PRODUCE THE
EUROPEAN COMMISSION DECISION

Judge: Honorable Samuel Conti
Court: Courtroom 1, 17th Floor
Date: October 24, 2014
Time: 10:00 a.m.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

2

3
4
5
6

7
8
9
0

1

2

3
4
5
6
7

- 8
9
20
21

23
24
25
26
27
28

(iii) the EC has made a partially redacted copy of the same Decision available in another proceeding, *Vichi v. Koninklijke Philips Electronics, N.V.*, 85 A.3d 725, 751 & n.180 (Del. Ch. 2014).

II. INTRODUCTION

The DAPs request the same relief now that they requested from the Court six months ago: that the Court order the production of the Decision, notwithstanding its confidentiality, because of its indisputably high relevance to the very conspiracy alleged by the DAPs. In March, the Court denied the motion without prejudice. Ex. 1. While recognizing that the conspiracy at issue in the Decision was the same conspiracy alleged in this action and that the Decision was thus clearly relevant to the DAPs' claims, Ex. 1 at 5, the Court nonetheless held that, because of Defendants' representation that the EC was likely to release a public version of the Decision prior to the close of fact discovery on September 5, 2014, the interests of comity made it premature to order production of the Decision. However, after being advised that the Decision's publication was dependent, in part, upon the efforts of Defendants, the Court advised Defendants "to proceed apace with their collaboration in the EC's public version of the Decision." Ex. 1 at 6.

Six months later—and nearly *two years* after stating that it was working towards a "quick publication"—the EC has still not issued a public version of the Decision. Moreover, despite repeated requests to the Defendants to reveal when the Decision would be published, Defendants as late as last week could provide no specific information as to the timing of the publication. Ex. 2, Sept. 4, 2014 Ltr. from R. Brass to A. Nardacci. Given the pendency of the March trial date set by the Court, and that the fact discovery period is now over, the DAPs can wait no longer. The DAPs are focused on preparing their cases for trial and further delay in the production of the Decision by the EC will prejudice their attempts to do so. As nearly two years have passed, comity no longer trumps the interests of the Court in ensuring that this highly relevant document is produced in time for it to be used in connection with the March 2015 trial. For these reasons, the DAPs respectfully request that the Court grant the DAPs' Renewed Motion to Compel Defendants to Produce the European Commission Decision.

1 In the alternative, the DAPs ask the Court to request assistance from the EC to obtain the
2 Decision, in the exact same fashion as another court in the United States successfully did in the
3 recent *Vichi* case. There, in an action regarding debts allegedly owed to the plaintiff by
4 Koninklijke Philips (one of the cartel members), the plaintiff had unsuccessfully attempted to
5 obtain a copy of the Decision from Koninklijke Philips. *Vichi*, 85 A.3d at 751. Koninklijke
6 Philips refused to produce the decision, asserting essentially identical arguments to those raised
7 by Defendants in this case. The plaintiff then asked the Delaware Chancery Court to intercede
8 and request “international assistance [of] the EC.” *Id.* The court did so, and the EC
9 subsequently provided a partially redacted copy of the Decision. *Id.* *Vichi* is therefore direct
10 precedent supporting the ability of the Court to obtain the Decision directly from the EC, as the
11 DAPs request.

12 III. FACTUAL BACKGROUND

13 The Decision at the heart of this Renewed Motion to Compel was issued by the EC on
14 December 5, 2012. EC decisions, like the one sought here, generally contain comprehensive
15 recitation of facts that are determined through lengthy and thorough investigative and
16 adjudicatory processes.²

17 Although the DAPs have received a four-page summary of the Decision, Ex. 4, this
18 summary lacks the factual detail that the DAPs seek. It is the DAPs’ understanding that the full
19 Decision is the culmination of a massive investigation by the EC into the existence of the illegal
20 global conspiracy to fix the prices for cathode ray tubes as alleged by the DAPs in this case. In
21 the Decision, according to the summary, the EC details the factual basis for its finding that
22 Defendants participated in long-running cathode display tube and cathode picture tube cartels.
23 The EC found that the cartels “were among the most organised cartels that the Commission has
24 investigated.” Cartel members “fixed prices, allocated market shares and customers and

25
26 ² For example, the EC also issued a decision regarding the LCD conspiracy, with which this
27 Court is familiar. That decision was 119 pages and contained nearly forty pages of detailed
28 factual description of the relevant conspiratorial contacts between competitors. *See generally*
Ex. 3.

1 restricted output.” The conspiracy was “highly organized” and reached “the worldwide level.”
2 The EC levied fines of over €1.47 billion against the conspirator companies.

3 While the Decision was confidential, the EC stated at the time the Decision was issued in
4 2012 that the EC and “the companies involved [were] in the process of establishing” a redacted
5 version of the Decision.³ Ex. 5. The EC noted that it was “trying to settle this issue as soon as
6 possible with a view to a quick publication.” *Id.*

7 On March 12, 2010, the Direct Purchaser Plaintiffs (“DPPs”) served Defendants with a
8 document request seeking “[a]ll Documents relating to, prepared for, submitted to, or received
9 from any foreign governmental or legislative investigative body, including ... the European
10 Commission.” Ex. 6, Req. No. 34; *see also* Ex. 7, Req. No. 30 (served Jan. 30, 2014).
11 Defendants refused to produce the Decision or any other documents responsive to this request.
12 After conferrals with plaintiffs’ counsel, *see, e.g.*, Ex. 8, July 29, 2013 Ltr. from R. Alexander
13 Saveri to M. Scarborough; Ex. 9, Sept. 20, 2013 Ltr. from P. Iovieno to M. Scarborough, *et al.*,
14 Defendants continued to refuse to produce the Decision. Ex. 10, Nov. 5, 2013 Ltr. from R. Brass
15 to P. Iovieno.

16 IV. PROCEDURAL BACKGROUND

17 On January 31, 2014, the DAPs filed a motion with the Special Master, the Honorable
18 Vaughn R. Walker, seeking to compel the production of the Decision. Ex. 11 (ECF No. 2446).
19 Defendants Chunghwa Picture Tubes, Ltd., LG Electronics, Philips, Samsung SDI, Toshiba
20 Corp., and MTPD Defendants responded on February 28, 2014. Ex. 12 (ECF No. 2449).

21 On March 4, 2014, the DAPs submitted a Statement of Recent Decision regarding *Vichi*
22 *v. Koninklijke Philips Electronics, N.V.*, 85 A.3d 725, 751 & n.180 (Del. Ch. 2014). Ex. 13
23 (ECF No. 2448). Defendants responded on March 12, 2014. Ex. 14 (ECF No. 2452). On March
24 17, 2014, the DAPs submitted a reply to the Court, which addressed Defendants’ response to the
25 Statement of Decision. Ex. 15.

26
27
28 ³ Of course, the DAPs note the inherent conflict of interest in permitting the release of a public
version to be dependent upon the actions of the wrongdoers.

Judge Walker subsequently recommended that this Court withdraw its reference as to the motion to compel. The Court adopted that recommendation.

On March 26, 2014, this Court denied without prejudice the DAPs' motion to compel production of the Decision, citing, among other things, Defendants' representation that they were working with the EC to finalize a public version and that publication was "likely" before the close of the fact discovery period. Ex. 1 at 8. Following the Court's Order, the DAPs corresponded with Defendants to determine whether a public version of the Decision would be forthcoming. See Ex. 16, July 7, 2014 Ltr. from P. Iovieno to R. Brass; Ex. 17, Aug. 8, 2014 Ltr. from P. Iovieno to R. Brass. Defendants were unable to identify a date when the Decision will be forthcoming. See Ex. 18, July 21, 2014 Ltr. from R. Brass to P. Iovieno; Ex. 19, Aug. 14, 2014 Ltr. from R. Brass to P. Iovieno; Ex. 2, Sept. 4, 2014 Ltr. from R. Brass to A. Nardacci.

V. ARGUMENT

In reaching its original decision on this issue, the Court relied primarily on the following five factors identified in *Société Nationale Industrielle Aérospatiale v. United States District Court for the Southern District of Iowa*, 482 U.S. 522, 544 n.28 (1987) ("*Société Nationale*"):

(1) The importance to the ... litigation of the documents or other information requested; (2) the degree of specificity of the request; (3) whether the information originated in the United States; (4) the availability of alternative means of securing the information; and (5) the extent to which noncompliance with the request would undermine important interests of the United States, or compliance with the request would undermine important interests of the state where the information is located.

Ex. 1 at 3.

The Court found that the majority of the *Société Nationale* factors weighed in favor of ordering the production of the Decision. First, Defendants had conceded that the DPPs' request was sufficiently specific to encompass the Decision. Ex. 12 at 3 ("Defendants do not dispute the specificity of the request."). And, on consideration, the Court found that the DPPs' request satisfied two of the remaining four factors: the Decision was important to the litigation because of its spot-on relevance, Ex. 1 at 4-5; and, outside of the motion to compel, "there does not

1 appear to be an alternative means of accessing the Decision without contravening EU law and
2 policy.” *Id.* at 6. These factors are unchanged and still weigh in favor of production.

3 Nonetheless, the Court found that at that time one of the *Société Nationale* factors,
4 comity, “outweigh[ed the need for] discovery in this instance.” Ex. 1 at 7. This was so because,
5 as Defendants argued at that time, “[t]his is not a time-sensitive issue. Fact discovery does not
6 close for another six months ... There is simply no reason for this Court to advance Plaintiffs’
7 interests over those of the EC.” Ex. 12 at 4. That is no longer the case. Fact discovery has
8 closed, and the deadline for the filing of motions to compel is today, which means that there is
9 every reason to advance Plaintiffs’ interest in redressing substantial injury by ordering
10 Defendants to produce the Decision now in time for it to be used connection with the upcoming
11 trial.

12 Comity, as this Court recognized, “is the recognition that one nation allows within its
13 territory to the legislative, executive, or judicial acts of another nation, having ***due regard both to***
14 ***international duty and convenience***, and to the rights of its own citizens or of other persons who
15 are under the protection of its laws.” Ex. 1 at 3 (quoting *Société Nationale*, 482 U.S. at 544; *In*
16 *re Rubber Chems. Antitrust Litig.*, 486 F. Supp. 2d 1078, 1081 (N.D. Cal. 2007) (emphasis
17 added)). The Court, by denying the DAPs’ initial motion to compel with approximately six
18 months of discovery remaining, showed “due regard to international duty and convenience” of
19 the European Union—and the EC’s—laws and policies. Indeed, notwithstanding the fact that the
20 Decision concerns the formation and the duration of the ***same conspiracy*** at issue here, that it
21 concerns the geographic reach of the ***same conspiracy*** at issue here, that it concerns the price-
22 fixing activities of the ***same conspiracy*** at issue here, and that it concerns the ***same defendants’***
23 attempts to conceal the ***same conspiracy*** at issue here, the Court deferred to the EU’s and EC’s
24 convenience and interest in privacy.

25 But comity, which the Supreme Court noted in *Société Nationale* refers to the “spirit of
26 cooperation,” is a two-way street. It is undisputed that the EC had notice both of this Court’s
27 decision, and of this proceeding’s deadlines, including the March 2015 trial date. *See, e.g.*, Ex.
28 18, July 21, 2014 Ltr. from R. Brass to P. Iovieno (stating that Defendants had “provided the EC

1 with courtesy copies of all the parties' briefing on this issue ... and notified them of [Plaintiffs']
2 most recent correspondence."); Ex. 2, Sept. 4, 2014 Ltr. from R. Brass to A. Nardacci. Yet,
3 despite the Court affording the EC an additional six months on top of over nearly one-and-a-half
4 years to release a public version of the Decision, it has not done so.

5 Ordering production of this highly relevant Decision now is further supported by the fact
6 that the Court recognized that the EC was working with Defendants to issue a public version of
7 the Decision and admonished Defendants to assist with that issuance before the close of fact
8 discovery. For example, the Court noted that "the speedy development of a public version of the
9 Decision is highly important," Ex. 1 at 6, and stated that "Defendants are encouraged to proceed
10 apace with their collaboration in the EC's public version of the Decision," *id.* at 6, and also that
11 Defendants are "advised to assist in that task," *id.* at 8. As noted above, even the fact that
12 Defendants are involved in determining when the public version of the Decision is issued raises a
13 conflict of interest, where any delay in the issuance of the Decision continues to prevent the
14 DAPs from obtaining it in time for its use at trial. While the DAPs conferred with Defendants on
15 numerous occasions in an attempt to obtain a date certain regarding the issuance of the public
16 version of the Decision—*see* Ex. 16, July 7, 2014 Ltr. from P. Iovieno to R. Brass; Ex. 17, Aug.
17 8, 2014 Ltr. from P. Iovieno to R. Brass—those efforts have proven utterly unsuccessful. Ex. 18,
18 July 21, 2014 Ltr. from R. Brass to P. Iovieno; Ex.19, Aug. 14, 2014 Ltr. from R. Brass to P.
19 Iovieno; Ex. 2, Sept. 4, 2014 Ltr. from R. Brass to A. Nardacci. Simply put, Defendants cannot
20 provide any specific information whatsoever regarding when the public version of the Decision
21 will be released. *Id.*

22 Finally, concerns over the Decision's confidentiality should not prohibit the Court from
23 granting the DAPs' Renewed Motion to Compel. On June 18, 2008, this Court issued a
24 protective order in this case that safeguards highly confidential information. Ex. 20 (ECF No.
25 306.) Thereunder, once information is designated as highly confidential, it can only be used in
26 "prosecuting, defending, or attempting to settle this action." *Id.* at § 7.1. It cannot be disclosed
27 in a way other than that specified by the protective order. *Id.* The DAPs would not challenge
28 any designation of the Decision as highly confidential. The protective order therefore resolves

1 any concerns the EC may have over the confidentiality of the Decision, particularly given that
2 the Decision includes every Defendant to this action.

3 The DAPs thus believe the interests of comity are now outweighed by the DAPs' interest
4 in redressing harm caused by Defendants' conspiracy. If this Court were to decline to compel
5 production of the Decision, though, the DAPs would ask the Court to take the same action as the
6 *Vichi* court. There, in determining the liability of Koninklijke Philips for the debts of a
7 subsidiary, the court addressed the plaintiff's efforts at obtaining the same Decision at issue here.
8 The plaintiff had been unable to do so on his own for the same reason that the DAPs cannot
9 obtain it: the "actual decision is confidential and has not been made available to the public." 85
10 A.3d at 751. At the plaintiff's request, "th[e] court [] made a request for international assistance
11 to the EC." *Id.* "In response, the EC made available a partially redacted copy of Section 6 of the
12 EC's [D]ecision."⁴ So too here, as the DAPs presume the EC would honor a similar request
13 from this Court, if the Court deemed it appropriate.⁵

14 VI. CONCLUSION

15 The DAPs respectfully request that this Court order Defendants to produce the December
16 5, 2012 Decision of the European Commission regarding the illegal global conspiracy to fix
17 prices for cathode ray tubes. Alternatively, the DAPs ask this Court to request international
18 assistance from the European Commission to obtain a copy of the Decision, as was done by the
19 *Vichi* court.

20
21
22
23
24 ⁴ That copy showed that "the EC held Philips N.V. liable for its involvement in both the CPT and
25 CDT price fixing cartels," *id.*, and made numerous other references to the factual underpinnings
26 of the CRT conspiracy. *Id.* Even the limited references to these factual findings in *Vichi* further
demonstrate the importance to the DAPs of obtaining the Decision here.

27 ⁵ Of course, there is no need for the EC to redact any portion of the Decision here, as unlike the
28 *Vichi* case—where Koninklijke Philips was the only cartel member who was a party to the case
and whose liability was thus at issue—all defendants implicated by the Decision are parties in
this action.

1 Dated: September 12, 2014

/s/ Philip J. Iovieno

2 Philip J. Iovieno
3 Anne M. Nardacci
4 BOIES, SCHILLER & FLEXNER LLP
5 30 South Pearl Street, 11th Floor
6 Albany, NY 12207
7 Telephone: (518) 434-0600
8 Facsimile: (518) 434-0665
9 Email: piovieno@bsfllp.com
10 anardacci@bsfllp.com

11 William A. Isaacson
12 BOIES, SCHILLER & FLEXNER LLP
13 5301 Wisconsin Ave. NW, Suite 800
14 Washington, D.C. 20015
15 Telephone: (202) 237-2727
16 Facsimile: (202) 237-6131
17 Email: wisaacson@bsfllp.com

18 Stuart Singer
19 BOIES, SCHILLER & FLEXNER LLP
20 401 East Las Olas Blvd., Suite 1200
21 Fort Lauderdale, FL 33301
22 Telephone: (954) 356-0011
23 Facsimile: (954) 356-0022
24 Email: ssinger@bsfllp.com

25 *Liaison Counsel for Direct Action Plaintiffs
26 and Attorneys for Plaintiffs Electrograph
27 Systems, Inc., Electrograph Technologies,
28 Corp., Office Depot, Inc., Compucom
Systems, Inc., Interbond Corporation of
America, P.C. Richard & Son Long Island
Corporation, MARTA Cooperative of
America, Inc., ABC Appliance, Inc., Schultze
Agency Services LLC on behalf of Tweeter
Opco, LLC and Tweeter Newco, LLC and
Tech Data Corporation and Tech Data
Product Management, Inc.*

s/ Scott N. Wagner

26 Robert W. Turken
27 Scott N. Wagner
28 Mitchell E. Widom
BILZIN SUMBERG MAENA PRICE &
AXELROD LLP

1450 Brickell Ave, Suite 2300
Miami, FL 33131-3456
Tel: 305-374-7580
Fax: 305-374-7593
Email: rturken@bilzin.com
swagner@bilzin.com
mwidom@bilzin.com

*Counsel for Plaintiffs Tech Data
Corporation and Tech Data Product
Management, Inc.*

/s/ Cori G. Moore

David J. Burman (pro hac vice)
Cori G. Moore (pro hac vice)
Eric J. Weiss (pro hac vice)
Nicholas H. Hesterberg (pro hac vice)
Steven D. Merriman (pro hac vice)
Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: (206)359-8000
Facsimile: (206)359-9000
Email: DBurman@perkinscoie.com
CGMoore@perkinscoie.com
EWeiss@perkinscoie.com
NHesterberg@perkinscoie.com
SMerriman@perkinscoie.com

Joren Bass, Bar No. 208143
Perkins Coie LLP
Four Embarcadero Center, Suite 2400
San Francisco, CA 94111-4131
Telephone: (415)344-7120
Facsimile: (415)344-7320
Email: JBass@perkinscoie.com

*Counsel for Plaintiff Costco Wholesale
Corporation*

/s/ David Martinez

Roman M. Silberfeld
David Martinez
Jill S. Casselman
ROBINS, KAPLAN, MILLER & CIRESI
L.L.P.

2049 Century Park East, Suite 3400
Los Angeles, CA 90067-3208
Telephone: (310) 552-0130
Facsimile: (310) 229-5800
Email: rmsilberfeld@rkmc.com
dmartinez@rkmc.com
jscasselman@rkmc.com

Elliot S. Kaplan
K. Craig Wildfang
Laura E. Nelson
ROBINS, KAPLAN, MILLER & CIRESI
L.L.P.
800 LaSalle Avenue
2800 LaSalle Plaza
Minneapolis, MN 55402
Telephone: (612) 349-8500
Facsimile: (612) 339-4181
Email: eskaplan@rkmc.com
kcwildfang@rkmc.com
lenelson@rkmc.com

*Counsel For Plaintiffs Best Buy Co., Inc.,
Best Buy Purchasing LLC, Best Buy
Enterprise Services, Inc., Best Buy Stores,
L.P., Bestbuy.com, L.L.C., and Magnolia Hi-
Fi, Inc.*

/s/ Michael P. Kenny

Michael P. Kenny
Debra D. Bernstein
Matthew D. Kent
ALSTON & BIRD LLP
1201 West Peachtree Street
Atlanta, Georgia 30309-3424
Telephone: (404)-881-7000
Facsimile: (404)-881-7777
Email: mike.kenny@alston.com
debra.bernstein@alston.com
matthew.kent@alston.com

James M. Wagstaffe, Esq. (SBN 95535)
KERR & SAGSTAFFE LLP
100 Spear Street, 18th Floor
San Francisco, California 94105-1576
Telephone: (415)-371-8500
Facsimile: (415)371-0500

Email: wagstaffe@kerrwagstaffe.com

Counsel For Plaintiffs Dell Inc. and Dell Products L.P.

/s/ William J. Blechman

Richard Alan Arnold
William J. Blechman
Kevin J. Murray
KENNY NACHWALTER, P.A.
201 S. Biscayne Blvd., Suite 1100
Miami, FL 33131
Tel: 305-373-1000
Fax: 305-372-1861
Email: rarnold@knpa.com
wblechman@knpa.com
kmurray@knpa.com

Counsel for Plaintiff Sears, Roebuck and Co. and Kmart Corp.

/s/ Kenneth S. Marks

H. Lee Godfrey
Kenneth S. Marks
Jonathan J. Ross
Johnny W. Carter
David M. Peterson
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, Texas 77002
Telephone: (713) 651-9366
Facsimile: (713) 654-6666
Email: lgodfrey@sumangodfrey.com
kmarks@susmangodfrey.com
jross@susmangodfrey.com
jcarter@susmangodfrey.com
dpeterson@susmangodfrey.com

Parker C. Folse III
Rachel S. Black
Jordan Connors
SUSMAN GODFREY L.L.P.
1201 Third Avenue, Suite 3800
Seattle, Washington 98101-3000
Telephone: (206) 516-3880
Facsimile: (206) 516-3883

Email: pfolse@susmangodfrey.com
rblack@susmangodfrey.com
jconnors@susmangodfrey.com

*Counsel for Plaintiff Alfred H. Siegel, as
Trustee of the Circuit City Stores, Inc.
Liquidating Trust*

/s/ Jason C. Murray

Jason C. Murray (CA Bar No. 169806)
CROWELL & MORING LLP
515 South Flower St., 40th Floor
Los Angeles, CA 90071
Telephone: 213-443-5582
Facsimile: 213-622-2690
Email: jmurray@crowell.com

Jerome A. Murphy (*pro hac vice*)
Astor H.L. Heaven (*pro hac vice*)
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: 202-624-2500
Facsimile: 202-628-5116
E-mail: jmurphy@crowell.com
aheaven@crowell.com

*Counsel for Target Corp. and ViewSonic
Corp.*

EXHIBIT 11

GIBSON, DUNN & CRUTCHER LLP
JOEL S. SANDERS, SBN 107234
jsanders@gibsondunn.com
RACHEL S. BRASS, SBN 219301
rbrass@gibsondunn.com
AUSTIN SCHWING, SBN 211696
aschwing@gibsondunn.com
555 Mission Street, Suite 3000
San Francisco, CA 94105
Telephone: (415) 393-8200
Facsimile: (415) 986-5309

Attorneys for Defendant
CHUNGHWA PICTURE TUBES, LTD.

[Additional counsel listed in signature blocks]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

In re: Cathode Ray Tube (CRT) ANTITRUST
LITIGATION

Master File No. 3:07-md-05944-SC

MDL No. 1917

This Document Relates To:

DIRECT ACTION PLAINTIFF ACTIONS

**DEFENDANTS' OPPOSITION TO DIRECT
ACTION PLAINTIFFS' RENEWED
MOTION TO COMPEL DEFENDANTS TO
PRODUCE THE EUROPEAN
COMMISSION DECISION**

Date: October 24, 2014

Time: 9:00 a.m.

Place: Courtroom 1, 17th Floor

Hon. Samuel Conti

INTRODUCTION

This Court has previously denied Plaintiffs' request for the exact document they now seek and there is no reason to change that ruling. On March 26, 2014, the Court denied Plaintiffs' motion to compel production of the confidential European Commission ("EC") decision relating to the EC's investigations regarding color display tubes ("CDT") and color picture tubes ("CPT") (collectively, cathode ray tubes) (the "Prior Order"). While Plaintiffs have filed a renewed motion seeking the decision, they provide no reason for the Court to depart from its prior ruling.

Plaintiffs make their renewed request *solely* on the basis that the EC has not yet published a public version of the decision—a possibility that the Court already took into account in its Prior Order. Plaintiffs mistakenly latch on to statements this Court made "encourag[ing]" Defendants to assist the EC in its finalization of a public decision and in so doing, misapprehend the clearly-articulated basis for the Court's ruling. Order at 8. Plaintiffs suggest that the Court somehow conditioned or premised its Prior Order on a public decision becoming available before the close of fact discovery. *Id.* at 6. That is wrong. Rather, the Court based its decision on the EC's stated interest in confidentiality as necessary to the effective operation of its leniency program, holding that international comity "outweighs the benefit the DAPs might receive in obtaining the Decision." *Id.* at 8.

International comity concerns still mandate against disclosure. Defendants understand that the EC is diligently working towards finalizing a public decision, and that the EC continues to oppose disclosure of the confidential decision because it would harm the European Union's ("EU") competition law enforcement regimes and policy interests. Brass Decl. ¶ 4; ECF Dkt. 2449, Ex. D (February 11, 2014 letter from EC opposing disclosure). Comity is more than "mere courtesy and good will," and courts should "take care to demonstrate due respect for . . . any sovereign interest expressed by a foreign state." *Société Nat'l Industrielle Aérospatiale v. U.S. Dist. Ct. for the S. Dist. of Iowa*, 482 U.S. 522, 544 n.27, 546 (1987). "Comity should be withheld only when its acceptance would be contrary or prejudicial to the interest of the nation called upon to give it effect." *Somportex Ltd. v. Phila. Chewing Gum Corp.*, 453 F.2d 435, 440 (3d Cir. 1971). There is no such basis here.

1 Plaintiffs provide no evidence beyond their speculation (Mot. at 1) that Defendants are not
2 complying with the Court's order and working with the EC towards a final decision. On the contrary,
3 Defendants have heeded the Court's instruction to assist the EC in its task; they have also kept the EC
4 informed of these proceedings and deadlines as this Court suggested. Brass Decl. ¶¶ 3, 6. It is not
5 unreasonable that the EC requires time to finalize a public decision. The EC decision stems from a
6 multilayered regulatory regime with extensive policies and detailed checks and balances governing
7 the process for release of public decisions. That Defendants have no control over the EC's process,
8 and the fact that the U.S. litigation is moving along a different timeline than that process provides no
9 basis to override the EC's stated interests.

10 Defendants understand that the EC intends to deliver imminently a formal statement of its
11 views on this issue to the Department of Justice. *Id.* ¶ 5. This statement is expected to be provided
12 to the Court in the coming days. *Id.* Defendants respectfully request that the Court defer a ruling
13 until the EC has had time to deliver that statement, and to seek further briefing from the parties in
14 reference to it, if that is of help to the Court.

15 For the reasons set forth in this opposition and those stated in the Prior Order, Plaintiffs'
16 motion to compel should be denied.

17 **BACKGROUND**

18 On January 31, 2014, Plaintiffs filed their first motion to compel production of the
19 confidential decision. ECF Dkt. 2447. Defendants opposed the motion on the grounds that requiring
20 production would violate well-established principles of international comity, and place Defendants in
21 the untenable position of acting contrary to express instructions of the EC in order to comply with an
22 order of this Court. ECF Dkt. 2449. In its opposition, Defendants further explained that the EC was
23 in the process of preparing the public version, and that Plaintiffs would have access to that version
24 once the EC completed that process. *Id.*

25 In a letter dated February 11, 2014 submitted by Defendants to the Court, Eric van
26 Ginderachter, Director of the EC's Directorate General for Competition, expressly objected to
27 disclosure of the decision, including to Plaintiffs. ECF Dkt. 2449, Ex. D. Disclosure would
28

undermine the EC's competition law enforcement, and in particular, its leniency program. *Id.* The EC also reiterated that it would strongly object to the disclosure of the confidential decision. *Id.*

On March 26, 2014, the Court declined to require disclosure of the decision based on the EC's stated interest in confidentiality and principles of international comity. The Court held that the EC's interest "outweighs the benefit the DAPs might receive in obtaining the Decision." Order at 8; *see also id.* at 6 ("the EU's interests override the need for production in this case"). The Court did not condition its decision on the availability of a public version, but did "encourage[] [Defendants] to proceed apace with their collaboration in the EC's public version of the Decision." *Id.* at 6.¹

Defendants immediately provided a copy of this Court's order to the EC and also provided the EC with the discovery and trial deadlines in this case. Brass Decl. ¶ 3. Since then each of the Defendants named in the EC decision has engaged with the EC regarding confidentiality and other issues that are prerequisites to finalizing a public decision. *Id.* ¶ 6. In addition, there are recipients of the decision who are not Defendants in this case, and the EC is also working with those companies on these same issues. *Id.* Finally, the EC maintains the position that any disclosure of the confidential decision would contravene the EC's rules and stated policy on this issue. *Id.* ¶ 4. In other words, by producing a copy of the EC's decision, the Defendants named in that decision would directly contravene the EC's position.

Defendants have kept Plaintiffs informed of their efforts to assist the EC and the status of the public decision, but are understandably unable to provide a date certain for publishing of the public decision. *See* Mot., Exs. 2 & 18. While those efforts are by EC requirements themselves confidential, it is generally understood that many of the entities named by the EC in its decision have resolved those issues, and the EC is working with others in good faith towards a similar end. Brass Decl. ¶ 6. However, finalization of the decision is, simply put, a matter outside of Defendants' control.

¹ The Court did not, as Plaintiffs state in their motion, "admonish[] Defendants" to assist the EC in finalizing a public decision. Mot. at 7; *see* Order at 8 ("[Defendants] are *advised* to assist in that task.") (emphasis added).

ARGUMENT

I. The Court Should Deny Plaintiffs’ Request For The Confidential Decision

That the EC is still finalizing its public decision does not change the fact that principles of international comity strongly outweigh Plaintiffs’ need for a document that is irrelevant, inadmissible, and cumulative to the evidence otherwise developed through discovery.

In the Prior Order, this Court applied the five-factor test set forth in *Aérospatiale* for analyzing requests for foreign materials:

(1) the importance to the . . . litigation of the documents or other information requested; (2) the degree of specificity of the request; (3) whether the information originated in the United States; (4) the availability of alternative means of securing the information; and (5) the extent to which noncompliance with the request would undermine important interests of the United States, or compliance with the request would undermine important interests of the state where the information is located.

Aérospatiale, 482 U.S. at 544 n.28. Balancing these factors, the court held that “comity outweighs discovery” of the decision. Order at 7. The Court should reach the same result again here.²

A. The Decision Is Not Important To The Litigation

Plaintiffs overstate the Court’s earlier findings regarding this factor. In the Prior Order, the Court found that this factor weighed in favor of disclosure because the decision “could include relevant facts.” *Id.* at 5. Contrary to Plaintiffs’ motion, the Court did not find that the decision “was important to the litigation because of its spot-on relevance,” nor did the Court “recogniz[e] that the conspiracy at issue in the Decision was the same conspiracy alleged in this action.” Mot. at 2, 5. Those statements contradict even those portions of the EC’s Summary of Decision quoted in Plaintiffs’ motion. *See id.* at 3-4.

No matter how many times plaintiffs italicize the word “same” in their filings with this Court, publicly available information confirms that the EC’s decision and this case do not involve the “same conspiracy.” The EC investigation and decision relate to EU—not U.S.—law. *See* Mot., Ex. 4, ¶ 1 (Summary of Decision). As this Court acknowledged, “[a]pplicable law would clearly be different in

² Defendants do not dispute the specificity of the request or that alternative means of accessing the decision are not presently available.

a foreign jurisdiction.” Order at 5. And while plaintiffs here expressly plead a single cathode ray tube conspiracy affecting all kinds of tubes, the EC’s Summary of Decision states that the EC investigation related to distinct CDT and CPT conduct. Mot. at 3 (“[A]ccording to the summary, . . . Defendants participated in long-running cathode display tube and cathode picture tube cartels . . .”); *compare, e.g.*, Best Buy First Am. Compl. ¶¶ 2, 242 with Mot., Ex. 4, ¶¶ 1, 3. And, the Summary of Decision emphasizes that the EC focused on conduct that allegedly had anticompetitive effects on the sale of CPTs and CDTs in Europe, not the U.S. See Mot., Ex. 4, ¶¶ 17-18; *In re Dynamic Random Access Memory Antitrust Litig.*, 546 F.3d 981 (9th Cir. 2008) (plaintiffs’ foreign injury claim based on overseas purchases was barred by the FTAIA); *Motorola Mobility, Inc. v. AU Optronics Corp.*, No. 09-c-6610, Dkt. No. 182 (N.D. Ill. Jan. 23, 2014) (same).

Defendants respectfully submit that even if the decision might contain some facts that overlap with those related to the Plaintiffs’ claims, there is no reason to believe that over four years of discovery in this case has not brought them out here. Plaintiffs do not explain why they cannot obtain the facts underlying the decision through already produced documents or depositions. The possibility that the decision will reveal any relevant information beyond the extensive discovery conducted and contemplated in this case is slim and “pales in comparison to the likely damage that mandating disclosure could do to the enforcement regime[] of . . . Europe.” *In re TFT-LCD Antitrust Litig.*, 07-md-1827-SI, ECF Dkt. 2686, slip op. at 11 (N.D. Cal. Apr. 26, 2011).

Indeed, since the Prior Order, Plaintiffs have received more documents and taken more depositions. Brass Decl. ¶ 8. In total, Defendants and alleged co-conspirators have collectively produced well over 5 million pages of documents created contemporaneously to the alleged conspiracy. *Id.* ¶ 9. Plaintiffs have taken 154 days of deposition testimony from 80 fact witnesses, utilizing, to date, over 1,500 exhibits. *Id.* ¶ 10. The depositions of 10 additional percipient witnesses have been noticed or are in the process of being scheduled. *Id.* ¶ 11. In addition, Plaintiffs have access to a wide variety of materials from other foreign government entities. For example, Plaintiffs already possess or have access to the public, final decisions of the Korea Fair Trade Commission, Anti-Monopoly Office of the Slovak Republic, Hungarian Competition Authority, and Office for the Protection of Competition of the Czech Republic in connection with their CPT and CDT

investigations.³ As with the EC decision, these decisions are not important to the litigation and do not involve the “same conspiracy” as this case; in any event, Plaintiffs have access to them and any mention of any facts which may overlap with those related to their claims.

Where the outcome of litigation “does not stand or fall on the present discovery order, or where the evidence sought is cumulative of existing evidence,” or not “directly relevant,” courts are generally unwilling to require disclosure in the face of comity objections. *Richmark Corp. v. Timber Falling Consultants*, 959 F.2d 1468, 1475 (9th Cir. 1992); see also *In re Rubber Chems. Antitrust Litig.*, 486 F. Supp. 2d 1078, 1082 (N.D. Cal. 2007) (where documents are noncritical or cumulative, “courts are less inclined to ignore a foreign state’s concerns”). The decision is not important to this litigation and weighs against production here.

B. The Decision Originated In The EU

As the Court held in its Prior Order, this factor weighs against disclosure. Plaintiffs do not dispute that the decision was prepared by the EC and originated in the EU, not the U.S. Order at 5. Further, Defendants have not released the decision in other litigation, and have continually complied with the EC’s view of their obligations with respect to confidentiality. *Id.*; Brass Decl. ¶ 7.

C. Requiring Disclosure Of The Confidential Decision Would Harm Important Interests Of The EU

As the Court held in its Prior Order, this factor weighs against disclosure because the EC’s interest “outweighs the benefit the DAPs might receive in obtaining the Decision.” Order at 8. This balance of the relative interests of the EU and U.S. is the most significant factor in determining whether to require disclosure of foreign materials. *Richmark*, 959 F.2d at 1476. There is no change in circumstances that justifies the Court revisiting its prior determination on this dispositive factor.

In the Prior Order, the Court found that “comity outweighs discovery” for several reasons. European law prohibits the EC from “disclosing information acquired or exchanged pursuant to the EU’s competition laws” and “also potentially subjects parties who disclose such confidential

³ The EC decision is also unlikely to be admissible at trial because it is irrelevant, unduly prejudicial, confusing, misleading, and hearsay, Fed. R. Evid. 401, 402, 403 & 801, making discovery here even less pressing.

information to official sanctions.” Order at 7 (citing EU law). Also, the EC submitted a letter opposing the disclosure of the decision because it would undermine the EC’s competition law enforcement, and in particular, its leniency program. *Id.* at 7-8. The Court further found that the EC depends on cooperation from U.S. law enforcement agencies, including the Department of Justice, in its enforcement work against cartels, and that the cooperation of the U.S. and EU agencies is an aspect of comity. *Id.* at 8 (citing *In re Rubber Chems.*, 486 F. Supp. 2d at 1084). Conversely, cooperation with an effective EC is important for the continued success of the U.S. enforcement regime.

Plaintiffs’ renewed motion does not dispute any of these conclusions. Plaintiffs cannot deny that the EC has a strong interest in confidentiality. *Richmark*, 959 F.2d at 1476 (the Court should consider “expressions of interest by the foreign state” and “indications of the foreign state’s concern for confidentiality prior to the controversy”).⁴ Nor can Plaintiffs dispute that production of the decision would violate EU law—they simply argue that it is okay to violate laws where it is the Plaintiffs that are inconvenienced by them. This, at end, is Plaintiffs’ only argument for why comity no longer outweighs the need for discovery. Mot. at 6. That the EC has not yet published a public decision despite awareness of these proceedings is not good reason to disregard the EC’s multifaceted and well-considered interest in confidentiality, and indeed is disingenuous, as the EC is actively working to secure publication as soon as possible.

⁴ The EC has long made clear that the promise of confidentiality is at the core of its leniency program and critical to its viability and success. As the EC explained to the Antitrust Modernization Commission, parties “which voluntarily cooperate with the Commission in revealing cartels cannot be put in a worse position in respect of civil claims than other cartel members which refuse cooperation.” ECF Dkt. 2449, Ex. E; *see also id.*, Ex. F (Commission Staff Working Paper accompanying the Communication from the Commission to the European Parliament and Council in 2009). In addition, the Court of Justice has also acknowledged the existence of a general presumption that the disclosure of confidential documents undermines both the objectives of investigation activities and that of the commercial interests of the undertakings involved in those proceedings. *See EC v. EnBW Energie Baden-Württemberg AG*, Case C-365/12 P (Feb. 27, 2014), ¶¶ 65-69 (ECF Dkt. 2449, Ex. G); *EC v. Editions Odile Jacob SAS*, Case C-404/10 (June 28, 2012), ¶ 123 (ECF Dkt. 2449, Ex. H); *EC v. Technische Glaswerke Ilmenau GmbH*, Case C-139/07 (June 29, 2010), ¶ 61 (ECF Dkt. 2449, Ex. I). Plaintiffs’ motion offered no case law in support of their arguments. If Plaintiffs raise new authority in a reply brief, Defendants should be allowed to submit a sur-reply.

Courts undertaking a comity analysis have consistently found the EU's confidentiality interest outweighed the need for discovery. *See In re TFT-LCD Antitrust Litig.*, 07-md-1827-SI, ECF Dkt. No. 2686, slip op. at 11 (N.D. Cal. Apr. 26, 2011) (denying motion to compel communications submitted to or received from the EC); *In re Rubber Chems.*, 486 F. Supp. 2d at 1084 (denying motion to compel production of communications with the EC); *In re Methionine Antitrust Litig.*, MDL No. 00-1311 CRB (JCS) (N.D. Cal. July 29, 2002) (adopting Special Master's report denying motion to compel unredacted written submissions made to the EC) (ECF Dkt. 2449, Exs. A & B); *see also In re Air Cargo Shipping Servs. Antitrust Litig.*, 06-md-1775-JG-VVP (E.D.N.Y. Dec. 19, 2011), Dkt. No. 1625 (denying motion to compel confidential EC decision) (ECF Dkt. 2449, Ex. C); *In re Payment Card Interchange Fee & Merchant Discount Antitrust Litig.*, No. 05-MD-1720, 2010 WL 3420517, at *10 (E.D.N.Y. Aug. 27, 2010) (denying motion to compel EC's Statement of Objections and oral hearing recording). There is no reason for a different result here.⁵

Ordering disclosure of the EC's confidential decision would compel Defendants to violate EU directives and directly undermine the EC's enforcement practice. Given that the EC has confirmed that it is still in the process of preparing a public decision, there is simply no reason to disregard its concerns set out in its letter. Brass Decl. ¶ 4.

II. The Procedure Adopted by the Delaware Court In *Vichi* Is Inappropriate In This Case

The Court should deny Plaintiffs' request in the alternative for the Court to make a request for international assistance to the EC for the decision, as the court did in *Vichi v. Koninklijke Philips Electronics, N.V.*, 85 A.3d 725 (Del. Ch. 2014). Mot. at 3, 8. The EC has already sent a letter to Defendants in this case expressly opposing disclosure of its confidential decision, including to Plaintiffs. Thus, it is highly unlikely that the EC would agree to the request. In addition, in stark contrast to the current case, the EC decision and EU law were directly relevant to U.S. liability issues in the Delaware litigation. Specifically, at issue in *Vichi* was whether the EC decision had a collateral

⁵ The Court of Justice of the EU has itself endorsed the position of the EC with regard to EU Member States. In *Kingdom of The Netherlands v. EC*, Case T-380/08 (Sept. 13, 2013), ¶ 42, the court rejected a request by The Netherlands (in its role as a damages claimant) for access to the confidential EC *Bitumen* decision, finding that the Netherlands's interest in information to understand the EC's rationale did not outweigh the EC's confidentiality interest.

estoppel effect under EU law with respect to plaintiff's claim of fraud, rendering the production of the decision to the U.S. court appropriate and necessary. *Vichi*, 85 A.3d at 778-84. Further, the EC only authorized the *Vichi* parties to produce to the court a narrowly redacted portion of the specific section of the EC decision that was directly relevant to the collateral estoppel issue; it did not authorize production of the decision in its entirety. Thus, there is no reason the Court should adopt the approach in *Vichi*.

CONCLUSION

For the foregoing reasons, Defendants respectfully request that the Court deny Plaintiffs' request for the confidential EC decision.

Dated: September 26, 2014

By: /s/ Rachel S. Brass

Rachel S. Brass (SBN 219301)
 Joel S. Sanders (SBN 107234)
 Austin V. Schwing (SBN 211696)
 GIBSON, DUNN & CRUTCHER LLP
 555 Mission Street, Suite 3000
 San Francisco, California 94105
 Telephone: (415) 393-8200
 Facsimile: (415) 393-8306
 jsanders@gibsondunn.com
 rbrass@gibsondunn.com
 aschwing@gibsondunn.com

Attorneys for Defendant Chunghwa Picture Tubes, Ltd.

DATED: September 26, 2014

By: /s/ Hojoon Hwang

Hojoon Hwang (SBN 184950)
 William D. Temko (SBN 98858)
 Laura K. Lin (SBN 281542)
 MUNGER, TOLLES & OLSON LLP
 560 Mission Street
 Twenty-Seventh Floor
 San Francisco, California 94105-2907
 Telephone: (415) 512-4000
 Facsimile: (415) 512-4077
 hojoon.hwang@mto.com
 william.temko@mto.com

laura.lin@mto.com

Attorneys for Defendant LG Electronics, Inc. and LG Electronics U.S.A., Inc.

DATED: September 26, 2014

By: /s/ Michael Scarborough

Gary L. Halling (SBN 66087)
James L. McGinnis (SBN 95788)
Michael Scarborough (SBN 203524)
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
Four Embarcadero Center, 17th Floor
San Francisco, CA 94111-4109
Telephone: (415) 434-9100
Facsimile: (415) 434-3947
ghalling@sheppardmullin.com
jmcginnis@sheppardmullin.com
mscarborough@sheppardmullin.com

*Attorneys for Defendants Samsung SDI Co., Ltd.,
Samsung SDI America, Inc., Samsung SDI (Malaysia)
Sdn. Bhd., Samsung SDI Mexico S.A. de C.V., Samsung
SDI Brasil Ltda., Shenzhen Samsung SDI Co., Ltd., and
Tianjin Samsung SDI Co., Ltd.*

Dated: September 26, 2014

By: /s/ Dana E. Foster

Christopher M. Curran (*pro hac vice*)
Lucius B. Lau (*pro hac vice*)
Dana E. Foster (*pro hac vice*)
WHITE & CASE LLP
701 Thirteenth Street, N.W.
Washington, DC 20005
tel.: (202) 626-3600
fax: (202) 639-9355
ccurran@whitecase.com
alau@whitecase.com
defoster@whitecase.com

*Counsel to Defendant Toshiba Corporation, Toshiba
America, Inc., Toshiba America Electronic Components,
Inc., Toshiba America Information Systems, Inc.,
Toshiba America Consumer Products, L.L.C.*

Dated: September 26, 2014

By: /s/ John M. Taladay

John M. Taladay
Joseph Ostoyich

Erik Koons
Charles M. Malaise
BAKER BOTTS L.L.P.
Washington, D.C. 20004-2400
Telephone: (202) 639-7700
Facsimile: (202) 639-7890
Email: john.taladay@bakerbotts.com
joseph.ostoyich@bakerbotts.com
erik.koons@bakerbotts.com
charles.malaise@bakerbotts.com

*Attorneys For Defendants Koninklijke Philips N.V. and
Philips Electronics North America Corporation*

Dated: September 26, 2014

By: /s/ Jeffrey L. Kessler

Jeffrey L. Kessler (*pro hac vice*)
A. Paul Victor (*pro hac vice*)
Aldo A. Badini (257086)
Eva W. Cole (*pro hac vice*)
Molly M. Donovan (*pro hac vice*)
WINSTON & STRAWN LLP
200 Park Avenue
New York, New York 10166-4193
Telephone: (212) 294-6700
Facsimile: (212) 294-4700
Email: jkessler@winston.com
pvictor@winston.com
abadini@winston.com
ewcole@winston.com
mmdonovan@winston.com

STEVEN A. REISS (*pro hac vice*)
DAVID L. YOHAI (*pro hac vice*)
ADAM C. HEMLOCK (*pro hac vice*)
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153-0119
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Email: steven.reiss@weil.com
david.yohai@weil.com
adam.hemlock@weil.com

BAMBO OBARO (267683)
WEIL, GOTSHAL & MANGES LLP
201 Redwood Shores Parkway
Redwood Shores, California 94065-1175
Telephone: (650) 802-3000
Facsimile: (650) 802-3100
Email: bambo.obaro@weil.com

*Attorneys for Defendants Panasonic Corporation of
North America, MT Picture Display Co., Ltd., and*

*Panasonic Corporation (f/k/a Matsushita Electric
Industrial Co., Ltd.)*

SIGNATURE ATTESTATION

The filer attests that concurrence in the filing of this document has been obtained from each of
the above signatories.

101680950.7.DOC

EXHIBIT 12

1 SHEPPARD MULLIN RICHTER & HAMPTON LLP
A Limited Liability Partnership
2 Including Professional Corporations
GARY L. HALLING, Cal. Bar No. 66087
3 JAMES L. MCGINNIS, Cal. Bar No. 95788
MICHAEL W. SCARBOROUGH, Cal. Bar No. 203524
4 Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4106
5 Telephone: 415-434-9100
Facsimile: 415-434-3947
6 E-mail: ghalling@sheppardmullin.com
jmcginnis@sheppardmullin.com
7 mscarborough@sheppardmullin.com

8 LEO D. CASERIA, Cal. Bar No. 240323
333 South Hope Street, 43rd Floor
9 Los Angeles, California 90071-1448
Telephone: 213-620-1780
10 Facsimile: 213-620-1398
E-mail: lcaseria@sheppardmullin.com

11 Attorneys for Defendants
12 SAMSUNG SDI AMERICA, INC.,
SAMSUNG SDI CO., LTD.,
13 SAMSUNG SDI (MALAYSIA) SDN. BHD.,
SAMSUNG SDI MEXICO S.A. DE C.V.,
14 SAMSUNG SDI BRASIL LTDA.,
SHENZEN SAMSUNG SDI CO., LTD. and
15 TIANJIN SAMSUNG SDI CO., LTD.

16
17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION
20

21 In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 07-5944 SC

MDL No. 1917

22
23
24 This Document Relates to:

25 TECH DATA ACTION
Individual Case No. 13-CV-00157 SI
26
27
28

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING DISCOVERY TO
OCCUR AFTER SEPTEMBER 5, 2014**

1 The undersigned Defendants (collectively, “Defendants”) and plaintiffs Tech Data
2 Corporation and Tech Data Product Management, Inc. (collectively, “Tech Data”) have conferred
3 by and through their counsel and, subject to the Court’s approval, HEREBY STIPULATE AS
4 FOLLOWS:

5 WHEREAS, September 5, 2014 is the deadline to complete fact discovery in the
6 Tech Data action.

7 WHEREAS, on August 28, 2014, Tech Data notified Defendants that due to a
8 mistake by its ESI vendor some documents that were designated as responsive were not produced
9 with Tech Data's prior production and that Tech Data would produce those documents to
10 Defendants on September 3, 2014.

11 WHEREAS, on September 3, 2014, Tech Data produced documents Bates labeled
12 TDCRT-068604 through TDCRT-107506.

13 WHEREAS, Defendants do not have sufficient time to review Tech Data’s
14 September 3 production prior to September 5, 2014.

15 WHEREAS, on July 21, 2014, Defendants requested deposition dates for Tech
16 Data witness Kellmeny Jeffcoat.

17 WHEREAS, on August 15, 2014, Defendants noticed the deposition of Kellmeny
18 Jeffcoat for September 5, 2014.

19 WHEREAS, Tech Data and Defendants have conferred and agreed to schedule
20 Kellmeny Jeffcoat’s deposition for a date, still to be determined, after September 5, 2014.

21 WHEREAS, Tech Data previously identified its former employees Mary Meador
22 and Susan Gilbert in response to Samsung SDI Co., Ltd.’s Interrogatory No. 1, but represented
23 that these individuals left Tech Data’s employment prior to 2000 and responsive documents, if
24 any, relating to these individuals have been produced to Defendants.

25 WHEREAS, in the interest of efficiency and preventing the unnecessary
26 expenditure of resources, Tech Data and Defendants agreed that in the event Susan Gilbert or
27 Mary Meador appear on Tech Data’s witness list for trial, Tech Data will make that witness
28 available for deposition at least 1 month before trial.

1 WHEREAS, on April 18, 2014, Tech Data agreed that it would search for and
2 produce hard copy documents relating to individuals that Defendants intend to depose and
3 individuals that Tech Data intends to rely on to support its claims.

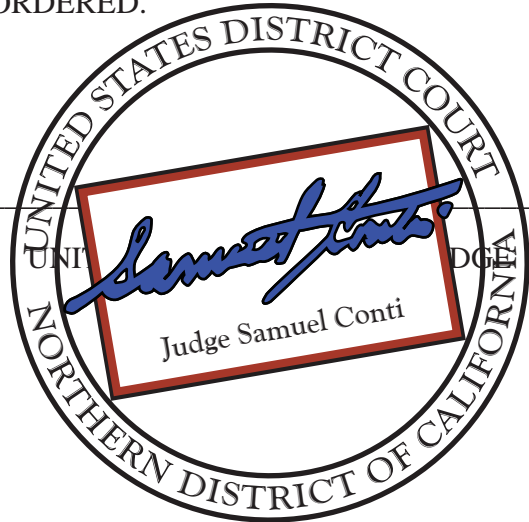
4
5 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED between
6 counsel as follows:

- 7
- 8 1. To the extent Defendants seek to take depositions, subject to the Court's Discovery
9 Protocol (Dkt. No. 1128) and solely related to documents or materials produced by
10 Tech Data on September 3, 2014, Tech Data will not oppose such requests on the basis
11 that they were made after the discovery cut-off. Tech Data, however, preserves all
12 other responses and objections to any additional depositions that may be sought by
13 Defendants under this paragraph. Tech Data shall work in good faith with Defendants
14 to resolve any issues that may arise with respect to deposition scheduling based on its
15 September 3 production.
 - 16 2. Defendants may notice and take the deposition of Tech Data witness Kellmeny Jeffcoat
17 after September 5, 2014, subject to the Court's Discovery Protocol (Dkt. No. 1128).
 - 18 3. Defendants may notice and take the depositions of Mary Meador and/or Susan Gilbert
19 after September 5, 2014 to the extent that these witnesses appear on Tech Data's
20 pretrial witness list, subject to the Court's Discovery Protocol (Dkt. No. 1128). To the
21 extent that either witness appears on Tech Data's pretrial witness list, Tech Data shall
22 make that witness available for deposition at least one month before trial.
 - 23 4. Tech Data shall search for and produce hard copy documents relating to any
24 individuals deposed after September 5, 2014. Tech Data shall produce any such
25 documents far enough in advance of the corresponding deposition to give Defendants
26 sufficient time to review those documents in preparation for that deposition.
- 27
28

- 1 5. To the extent motions to compel may be required for items 1-4 above, Defendants may
2 file those motions within a reasonable period after the depositions in question.

3
4 PURSUANT TO STIPULATION, IT IS SO ORDERED.

5
6
7 Dated: 09/08/2014



1 Dated: September 5, 2014

By: /s/ Leo D. Caseria

2 SHEPPARD MULLIN RICHTER & HAMPTON
3 LLP

4 Gary L. Halling, Cal. Bar No. 66087

5 James L. McGinnis, Cal. Bar No. 95788

6 Michael W. Scarborough, Cal. Bar No. 203524

7 Four Embarcadero Center, 17th Floor

8 San Francisco, CA 94111-4109

9 Telephone: (415) 434-9100

10 Facsimile: (415) 434-3947

11 E-mail: ghalling@sheppardmullin.com

jmcginnis@sheppardmullin.com

mscarborough@sheppardmullin.com

12 Leo D. Caseria, Cal. Bar No. 240323

13 333 South Hope Street, 43rd Floor

14 Los Angeles, California 90071-1448

15 Telephone: 213-620-1780

16 Facsimile: 213-620-1398

17 E-mail: lcaseria@sheppardmullin.com

18 *Attorneys for Defendants Samsung SDI America,*
19 *Inc.; Samsung SDI Co., Ltd.; Samsung SDI*
20 *(Malaysia) SDN. BHD.; Samsung SDI Mexico S.A.*
21 *DE C.V.; Samsung SDI Brasil Ltda.; Shenzhen*
22 *Samsung SDI Co., Ltd. and Tianjin Samsung SDI*
23 *Co., Ltd.*

24 By: /s/ Scott N. Wagner

25 BILZIN SUMBERG BAENA PRICE & AXELROD
26 LLP

27 Robert W. Turken

28 Scott N. Wagner

1450 Brickell Ave, Suite 2300

Miami, FL 33131-3456

Telephone: (305) 374-7580

Facsimile: (305) 374-7593

Email: rturken@bilzin.com

swagner@bilzin.com

BOIES, SCHILLER & FLEXNER LLP

Stuart Singer

401 East Las Olas Blvd., Suite 1200

Fort Lauderdale, FL 33301

Telephone: (954) 356-0011

Facsimile: (954) 356-0022

Email: ssinger@bsflp.com

1 William A. Isaacson
2 5301 Wisconsin Ave. NW, Suite 800
3 Washington, D.C. 20015
4 Telephone: (202) 237-2727
5 Facsimile: (202) 237-6131
6 Email: wisaacson@bsfllp.com

7 Philip J. Iovieno
8 Anne M. Nardacci
9 30 South Pearl Street, 11th Floor
10 Albany, NY 12207
11 Telephone: (518) 434-0600
12 Facsimile: (518) 434-0665
13 Email: piovieno@bsfllp.com
14 anardacci@bsfllp.com

15 *Attorneys for Plaintiffs Tech Data Corporation and*
16 *Tech Data Product Management*

17 By: /s/ Jeffrey L. Kessler
18 WINSTON & STRAWN LLP
19 Jeffrey L. Kessler (*pro hac vice*)
20 A. Paul Victor (*pro hac vice*)
21 Aldo A. Badini, Cal. Bar No. 257086
22 Eva W. Cole (*pro hac vice*)
23 Molly M. Donovan (*pro hac vice*)
24 200 Park Avenue
25 New York, NY 10166
26 Telephone: (212) 294-4692
27 Facsimile: (212) 294-4700
28 Email: jkessler@winston.com
abadini@winston.com
pvictor@winston.com
ewcole@winston.com
mmdonovan@winston.com

WEIL, GOTSHAL & MANGES LLP
Steven A. Reiss (*pro hac vice*)
David L. Yohai (*pro hac vice*)
Adam C. Hemlock (*pro hac vice*)
767 Fifth Avenue
New York, NY 10153-0119
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Email: steven.reiss@weil.com
david.yohai@weil.com
adam.hemlock@weil.com

1 *Attorneys for Defendants Panasonic Corporation*
2 *(f/k/a Matsushita Electric Industrial Co., Ltd.),*
3 *Panasonic Corporation of North America, and MT*
4 *Picture Display Co., Ltd.*

5 By: /s/ Jon V. Swenson
6 BAKER BOTTS LLP
7 Jon V. Swenson, Cal Bar No. 233054
8 1001 Page Mill Road
9 Building One, Suite 200
10 Palo Alto, CA 94304
11 Telephone: (650) 739-7500
12 Facsimile: (650) 739-7699
13 Email: jon.swenson@bakerbotts.com

14 John M. Taladay (*pro hac vice*)
15 Joseph Ostoyich (*pro hac vice*)
16 Erik T. Koons (*pro hac vice*)
17 Charles M. Malaise (*pro hac vice*)
18 1299 Pennsylvania Ave., N.W.
19 Washington, DC 20004-2400
20 Telephone: (202) 639-7700
21 Facsimile: (202) 639-7890
22 Email: john.taladay@bakerbotts.com
23 joseph.ostoyich@bakerbotts.com
24 erik.koons@bakerbotts.com
25 charles.malaise@bakerbotts.com

26 *Attorneys for Defendants Koninklijke Philips N.V.*
27 *and Philips Electronics North America Corporation*

28 By: /s/ Richard Snyder
FRESHFIELDS BRUCKHAUS
DERINGER US LLP
Terry Calvani Cal. Bar. No. 53260
Christine Laciak (*pro hac vice*)
Richard Snyder (*pro hac vice*)
701 Pennsylvania Avenue NW, Suite 600
Washington, D.C. 20004
Telephone: (202) 777-4565
Facsimile: (202) 777-4555
Email: terry.calvani@freshfields.com
christine.laciak@freshfields.com
richard.snyder@freshfields.com

Attorneys for Beijing-Matsushita Color CRT

Company, Ltd.

By: /s/ Eliot A. Adelson
KIRKLAND & ELLIS LLP
 Eliot A. Adelson, Cal. Bar. No. 205284
 555 California Street, 27th Floor
 San Francisco, CA 94104
 Telephone: (415) 439-1413
 Facsimile: (415) 439-1500
 Email: eadelson@kirkland.com

Attorneys for Defendants Hitachi, Ltd., Hitachi Displays, Ltd. (n/k/a Japan Display East, Inc.), Hitachi Asia, Ltd., Hitachi America, Ltd., and Hitachi Electronic Devices (USA), Inc.

By: /s/ Lucius B. Lau
 WHITE & CASE LLP
 Christopher M. Curran (*pro hac vice*)
 George L. Paul (*pro hac vice*)
 Lucius B. Lau (*pro hac vice*)
 701 Thirteenth Street, N.W.
 Washington, D.C. 20005
 Telephone: (202) 626-3600
 Facsimile: (202) 639-9355
 Email: ccurran@whitecase.com
 gpaul@whitecase.com
 alau@whitecase.com

*Attorneys for Defendants Toshiba Corporation,
Toshiba America, Inc., Toshiba America Information
Systems, Inc., Toshiba America Consumer Products,
L.L.C., and Toshiba America Electronic Components,
Inc.*

By: /s/ Rachel S. Brass
GIBSON, DUNN & CRUTCHER LLP
Rachel S. Brass, Cal. Bar. No. 219301
Joel S. Sanders, Cal. Bar. No. 107234
Austin V. Schwing, Cal. Bar. No. 211696
555 Mission Street, Suite 3000
San Francisco, CA 94105
Telephone: (415) 393-8200
Facsimile: (415) 393-8306
Email: rbrass@gibsondunn.com
jsanders@gibsondunn.com

1 aschwing@gibsondunn.com

2 *Attorneys for Defendants Chunghwa Picture Tubes,*
3 *Ltd. and Chunghwa Picture Tubes (Malaysia)*

4 By: /s/ Hojoon Hwang
5 MUNGER, TOLLES & OLSON LLP
6 Hojoon Hwang, Cal. Bar. No. 184950
7 William D. Temko, Cal. Bar. No. 98858
8 Laura K. Lin, Cal. Bar. No. 281542
9 560 Mission Street
10 Twenty-Seventh Floor
11 San Francisco, California 94105-2907
12 Telephone: (415) 512-4000
13 Facsimile: (415) 512-4077
14 Email: hojoon.hwang@mto.com
15 william.temko@mto.com
16 laura.lin@mto.com

17 *Attorneys For Defendants LG Electronics, Inc. and*
18 *LG Electronics U.S.A., Inc.*

19 By: /s/ Kathy L. Osborn
20 FAEGRE BAKER DANIELS LLP
21 Kathy L. Osborn (pro hac vice)
22 Ryan M. Hurley (pro hac vice)
23 300 N. Meridian Street, Suite 2700
24 Indianapolis, IN 46204
25 Telephone: (317) 237-0300
26 Facsimile: (317) 237-1000
27 Email: kathy.osborn@FaegreBD.com
28 ryan.hurley@FaegreBD.com

Jeffrey S. Roberts (pro hac vice)
3200 Wells Fargo Center
1700 Lincoln Street
Denver, CO 80203
Telephone: (303) 607-3500
Facsimile: (303) 607-3600
Email: jeff.roberts@FaegreBD.com

Stephen M. Judge (pro hac vice)
202 S. Michigan Street, Suite 1400
South Bend, IN 46601
Telephone: (574) 234-4149
Facsimile: (574) 239-1900
Email: steve.judge@FaegreBd.com

Calvin L. Litsey, Cal. Bar. No. 289659
1950 University Avenue, Suite 450
East Palo Alto, CA 94303-2279
Telephone: (650) 324-6700
Facsimile: (650) 324-6701
Email: calvin.litsey@FaegreBD.com

*Attorneys for Defendants Thomson SA and Thomson
Consumer Electronics, Inc.*

Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of
this document has been obtained from each of the above signatories.